

Report on Wet Tropics Management Plan 1998 Review Phase Two Consultation

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Report on Wet Tropics Management Plan 1998 Review Phase Two Consultation

This consultation report provides a review of submissions received on the Wet Tropics (Review) Amendment Management Plan 2019—*Consultation Draft v23* (the proposed amendments). The consultation report is broken into two sections:

Section one: Key issues—phase two

Section one summarises the key issues raised in submissions during phase two consultation. These matters are organised consistent with the themes in the consultation brochure. Section One includes submissions supporting the proposed amendments as well as significant concerns raised.

The phase two consultation Brochure 'Wet Tropics Plan Review Phase 2' (a copy can be found at: www.wettropics.gov.au/planreview) describes the key draft amendments by topic. The brochure also gives a brief explanation of why each amendment was proposed.

Section two: Full consultation report—phase two

Section two provides a summary of the matters raised in each submission, the Authority's position, and response to the issue.

Submissions

The minimum public consultation period for phase two was 40 days. The official consultation period extended for 48 days. Some individuals and organisations requested extensions to the submission period. Where a request was made in writing, these were approved. This report includes written submissions in relation to the Consultation Draft and proposed amendments to zoning maps made during the formal consultation period or by agreed extension.

Consultation process

The review of the Wet Tropics Management Plan 1998 (the Management Plan) has occurred in two stages. Phase one consultation sought stakeholders' views about how the Management Plan could be improved. Feedback from Phase one supported the development of proposed amendments to the Management Plan and development of a Strategic Plan to accommodate matters that could not be addressed in the regulation. The Authority received 91 submissions during phase one consultation.

Phase two consultation sought feedback on a consultation version of the Wet Tropics (Review) Amendment Management Plan 2019—*Consultation Draft* and the Wet Tropics Strategic Plan 2020–2030. The Authority received 49 submissions during phase two consultation.

Note: more detail on the consultation undertaken can be found at Appendix A.

Section one: Key issues—phase two

The following table summarises the key issues raised in submissions during phase two consultation. These issues are organised according to the themes in the consultation brochure.

Key issues include:

- 1. New Wet Tropics Strategic Plan 2020-2030
- 2. An improved zoning system
- 3. Enabling appropriate visitor infrastructure
- 4. Reducing impacts of community service infrastructure on values of the Wet Tropics of Queensland World Heritage Area (the Area)
- 5. Amendments to regulation of domestic activities
- 6. Recognising Rainforest Aboriginal tradition
- 7. Roads in the Area—a simpler system
- 8. Undesirable plants and animals
- 9. Reconfiguration or subdivision of an allotment
- 10. Other issues considered (mining and offsets)

Each theme described in the consultation brochure is accompanied by a short summary of the key changes proposed by the Authority during phase two consultation.

A summary of the submissions that support or raising concerns about the proposed amendments are included.

A table within **Section one** then provides further detail for this summary, including the Authority's position and response to concerns raised. The content of each column is described in the table structure below.

Table structure

Submitter		
<i>Note:</i> reference to specific sections of the proposed amendments should be considered a reference to the final draft Wet Tropics (Review) Amendment Management Plan 2020 <i>v39</i> , unless otherwise indicated.		
Issue	Authority's position	Authority's response
Summary of the matters raised in each individual submission. The matters raised have been organised according to the themes in the phase two consultation brochure.	Indicates how the matter is being addressed by the Authority.	Outlines the Authority's considerations and any action the Authority has subsequently taken in response to the comment(s) raised. Responses include proposed further amendments to the Management Plan; follow-up consultation with the submitter to discuss the issue raised; deciding not to make any amendment as the comment was in support of the Consultation Draft, or the change proposed by the submitter was not acceptable to the Authority.

Authority's position—glossary of terms:

Agreed—the Authority proposes a change to the Strategic Plan, Management Plan or zoning maps resulting from the submission.

No change—this signifies that the Authority acknowledges the concern expressed by the submitter but there has been no corresponding change to the Strategic Plan, Management Plan or zoning maps.

Noted—the Authority acknowledges the support of the submitter.

Interpretation issue—the Authority considers that there has been a misunderstanding by the submitter about the matter raised.

Note: further detail on each submission can be found in **Section two**—full consultation report.

1. New Wet Tropics Strategic Plan 2020–2030—feedback during phase one consultation led to development of the Wet Tropics Strategic Plan 2020–2030 (the Strategic Plan) to address issues that are not able to be addressed by the Management Plan. The Strategic Plan guides the development of the Authority's annual work plans and communicates organisational priorities and strategies.

Summary of views

Support: There were a number of submissions provided feedback on Strategic Plan matters. Submissions overwhelmingly supported the development of the Strategic Plan. Submissions ranged from minor editorial changes to recognise specific stakeholder groups in the delivery of outcomes, to more detailed structural changes to enhance operation of strategies or actions. The Authority supports many of the requested changes and has prepared a revised version of the Strategic Plan.

2. An improved zoning system—the proposed amendments move from a system based on integrity and distance from disturbance, to a system based on the intended management purpose of each zone. This delivers simpler and more consistent zoning rules. The purpose of zones in the revised Management Plan describes the management purpose moving forward, not the existing integrity or condition of any particular area of land. Key changes include an increase in zone A from 52% to 92.5% of the area and the amalgamation of zone D (visitor infrastructure) into zone C. This amalgamation allows broader consideration of permit applications for tourism infrastructure. Activities previously allowed in each zone are now more clearly defined.

Summary of views

Support: Generally, there was support for the changes to the zoning system. Some groups supported the clarification of activities allowed in each zone through new definitions of limited and developed visitor infrastructure (see Enabling appropriate visitor infrastructure theme below).

Concerns: A number of submissions from conservation organisations, and individual submitters raised concerns regarding a perception that the proposed amendments would result in a 'weakening of conservation outcomes' through changes to the management purpose of the zone and concern regarding the inclusion of new definitions of visitor infrastructure in each zone.

The tourism sector raised concerns over zone changes (removing the 'physical and social setting'). These changes were perceived to limit the communication of tourism potential.

Community service infrastructure was generally correctly depicted on the proposed zoning maps. However, several state government agencies and community service infrastructure providers raised concerns that the proposed zoning maps did not accurately depict their existing infrastructure or ongoing maintenance needs. Post Phase 2 consultation, the Authority has negotiated with submitters to resolve almost all community service infrastructure related zoning matters.

Table 2.1: Support—an improved zoning system

Submission 25		
Issue	Authority's position	Authority's response
Generally support the rationalisation of the World Heritage Zoning system	Agreed	No further comment.
Submission 19		
We have been pleased to note that recovery of the forest has been such that a large percentage can now be considered to be in good condition and can be included in zone A.	Agreed	No further comment.

Table 2.2: Concerns—an improved zoning system

Submission 49		
Issue	Authority's position	Authority's response
Question whether zone changes result in better protection of World Heritage values. Particularly: • 'changes to the zone purpose, nature of land in the zone and removal of the 'intended physical and social setting'. • Perceive changes to result in 'watering-down' of the primary conservation purpose of each of the zones.	Interpretation issue	The interpretation that changes to the management purpose, removal of the physical and social setting and land included in the zone is a weakening of conservation outcomes is incorrect. The Authority's intent for the proposed zoning amendments is to strengthen the protection of values for which the Area is listed (World Heritage values). The Authority believes this intent has been achieved by: increasing the area of land that is afforded the highest level of protection (zone A increased from 52% to 93%) strengthening the level of scrutiny of new infrastructure proposals strengthening the assessment for all proposed development in the Area through the use of the terms 'World Heritage values (WHV) and integrity', rather than just Outstanding Universal Value (OUV). We have looked carefully at the fundamental principles against which decisions are made under the Management Plan. The test using WHV and integrity is consistent with the

		Environmental Protection and Biodiversity Conservation Act 1999 and provides more clarity as opposed to the reference to OUV or to the primary goal.
Submission 20		· · · · ·
Issue	Authority's position	Authority's response
It appears that the way land in the Wet Tropics World Heritage Area is classified into zones no longer relates to the environmental value of the land, but the intended use/access of the land presently or in the future. This is a step away from a conservation purpose to a land use purpose.	No change	The Authority's intent for the proposed amendments to the management purpose of the zones is to describe the management purpose, not the existing integrity or condition of any particular area of land. The proposed changes reduce the risk of a proponent contesting the 'value' of the land if an area in a zone is found to be disturbed. See response above.
Submission 26		
The omission of the 'intended physical and social setting' section plus the re-wording of the Management Purpose within each zone has in some ways limited the practicable application of the plan even further.	Interpretation issue	The interpretation that the omission of the physical and social setting has limited the application of the Management Plan as it relates to visitor access is incorrect. The Authority's intent is that the proposed amendments to the Management Plan state that allowing access for visitors to appreciate and enjoy to parts of the Area is a key purpose of all zones. Including zone D into zone C allows for broader consideration of appropriate tourism infrastructure Strategy 4 of the Strategic Plan also clearly articulates the Authority's support for world-class tourism and recreation.
Submission 13 Where a road is located in proximity or adjacent to the boundary of the Wet Tropics World Heritage Area, appropriate zones should be generated inside the World Heritage Area.	Agreed	The Authority has resolved these concerns with the submitter. The proposed amendments to the Management Plan already include provisions that can support ongoing maintenance of most of these roads: • amending a zoning map s.19 (minor amendment to zone boundary) • in all zones a permit may be issued for an activity for protecting the lives or property other than an activity carried out in an emergency.

Zoning rule exception: The Authority proposes an exception to zoning rules for a 100m section of the Cook Highway at Pebbly Beach. In this section, the road outside the Area will generate a zone C buffer inside the Area. The Authority will work to manage any future impacts on the Area through a permit process.

Submission 25

Request increase the Kuranda Scenic Rail upper slope zone C buffer to 250m to accommodate slope stabilisation works in the near future.

No change

The Authority has resolved these concerns with the submitter. The Authority had already applied a concession to allow a 100m zone C buffer on the upper slopes of the Kuranda Scenic Rail instead of the standard 50m buffer.

The proposed amendments to the Management Plan provide other mechanisms to accommodate any necessary slope stabilisation works without further expansion of the zone C buffer.

Under the proposed amendments a permit may be issued in any zones for:

- s.33(h) an activity for protecting the lives of, or preventing injuries to, persons, other than an activity carried out in an emergency
- s.33(i) an activity for the protection, other than the urgent protection, of property.

Submission 14

Request that existing water intake locations are not rezoned from zone B to zone A. All areas of the listed water intakes which are not zone C are requested to remain zone B.

Agreed

The Authority has undertaken an assessment of all water intakes to ensure that they are zoned appropriately.

The Authority has also introduced an exception to zoning rules for water intake infrastructure. Water intakes will now generate a zone B buffer. This will enable local government to apply for a future rezoning from zone B to zone C to accommodate future essential community service infrastructure that cannot be accommodated within the existing zone C area.

3. Enabling appropriate visitor infrastructure—The proposed amendments provide more clarity about what types of infrastructure may be allowed in each zone under a permit. The proposed amendments do not allow any additional development in zone A or B that is not already

allowed under the current Management Plan (this the interpretation of some submitters). In all zones the definition of limited visitor infrastructure now applies to clarify possible activities. The purpose of zone C has changed to also allow appropriate developed visitor infrastructure. For any proposed activity in the Area, the principles and criteria for assessing a permit will still apply and the approval of the relevant land manager may be required.

Summary of views

Support: Generally, government agencies the Tourism industry and Rainforest Aboriginal Peoples submissions supported the changes which enable a more flexible approach to considering visitor infrastructure proposals. The Tourism sector also supported the inclusion of definitions for limited and developed visitor infrastructure. Several registered native title bodies corporate (RNTBC) provided submissions in support of the proposed changes as they related to realising aspirations for tourism infrastructure on native title lands inside the Area.

Concern: Several submissions from conservation organisations, and individual submitters raised concerns that the proposed amendments go beyond providing flexibility for visitor infrastructure. Specifically, submissions raised concerns with the definition for 'developed visitor infrastructure' and the inclusion of the terms 'nature-based tourist park and nature-based tourist accommodation'. Concerns related to the lack of clarity regarding controls on the scope and scale deemed appropriate by the Authority. Submissions also raise concerns about the amalgamation of zone D and C, stating that a strategic assessment and plan for tourism should be undertaken with the involvement of all relevant stakeholders before zoning changes were made.

A submission from a tourism industry peak body also raised concerns regarding definitions of developed and limited visitor infrastructure falling short of adequately expressing the tourism potential of the Area.

Table 3.1: Support—enabling appropriate visitor infrastructure

Submission 4		
Issue	Authority's position	Authority's response
Support the current version of the Plan as it relates to the State's tourism interests, particularly concerning the additional flexibility offered through the Plan in relation to establishing new tourism opportunities and additional visitor infrastructure in all zones of the Area.	Agreed	No Further comment.
Submission 41 and 42		
Pleased to note that the changes to the plan provide greater opportunity for appropriate future visitor infrastructure in all zones.	Agreed	No further comment.

Table 3.2: Concerns—Enabling appropriate visitor infrastructure

Submission 49		
Issue	Authority's position	Authority's response
Recommendation 2—keep the area currently known as zone A as it is, with its existing definition and restrictions on development	No change	The Authority understands that the conservation sector is concerned that the change of the management purpose of each zone and clarification of the type of visitor infrastructure allowed in all zones is a weakening of protection for land in zone A.
		The level of protection for zone A will be strengthened under the new Management Plan (see Authority's response to submission 49 under— <i>improved zoning system</i>). The amendments do not allow any additional development in zone A that is not already allowed under the current Management Plan.
Recommendation 4—collapsing zone D into C increases the area where 'developed visitor infrastructure' is permitted from 254ha to 12,353ha. This goes way beyond flexibility.	No change	The intent of collapsing zones D and C together is not to increase the amount of tourism infrastructure development but allow broader consideration of appropriate tourism infrastructure in the most appropriate places to present the Area.
		Consideration of any proposal for 'developed visitor infrastructure' in zone C would be subject to the principles and criteria for deciding permit applications.
		In response to submissions the Authority has further clarified the management purpose for zone C in the proposed amendments s.12: 'Another management purpose of zone C is to ensure, so far as is reasonably practicable, that any visitor infrastructure on land in the zone is built and maintained in a way that— (a) is ecologically sustainable; and (b) is sensitively integrated into the surrounding landscape; and
		(c) increases visitors' understanding and appreciation of the natural and cultural heritage of the area'.
Recommendation 5—prior to any new 'visitor infrastructure' develop a strategic assessment and plan for tourism, with the	Agreed	The Authority has secured funding under the Heritage Grants program to develop a key component of a strategic assessment and plan for tourism—this will take the

primary goal of improving presentation and transmission.		form of a future 'Wet Tropics Tourism and Destination Plan'. The intent is to undertake full public consultation, and to make the plan publicly available.
Recommendation 7—remove 'nature-based tourist park' and 'nature-based tourist accommodation' from definition of 'developed visitor infrastructure'.	Agreed	The Authority has removed the examples of 'nature-based tourist park' and 'nature-based tourist accommodation' from the definition of developed visitor infrastructure. In response to submissions the Authority has further clarified the scope of developed visitor infrastructure under the management purpose of zone C. Developed visitor infrastructure must be developed and managed to be ecologically sustainable, sensitively integrated into the surrounding landscape, and to increase visitor appreciation and understanding of natural and cultural heritage.
Submission 20	J	
The examples of limited visitor infrastructure are ambiguous, with no clear indication of the capacity of 'small-scale'. The lack of certainty written into the draft amended Plan makes it impossible for us to comment on what the scale, size or footprint that the limited visitor infrastructure will have on the World Heritage Area.	No change	The amendments to the Management Plan do not allow any additional development in zone A that is not already allowed under the current plan. Any application to undertake an activity will be assessed on a case by case basis against the principles and criteria for deciding an application. However, in response to submissions, the Authority has provided greater clarity regarding cumulative impact in the permit assessment process in the proposed amendments.
Submission 26		
Definition of 'developed' and 'limited visitor infrastructure' does little to illuminate tourism potential nor the supporting facilities required to ensure the tourism potential is delivered.	No change	The definitions of 'developed' and 'limited visitor infrastructure' are not intended to describe the tourism potential. These definitions describe the type of infrastructure that may be considered in each zone. The Strategic Plan is a more appropriate
The new management of the second of the secon	1	tool to describe the tourism potential.
The new management purpose of zone C now simply allows community services and visitor	Interpretation issue	The interpretation that the zone purpose is a primary means of communicating how an

infrastructure. Within this, there is no explicit consideration of the needs, engagement or enjoyment	area may accommodate the needs and engagement of visitors is incorrect
of the community or visitors, the	The Authority's intent is to clarify that the
reference to these stakeholders	Strategic Plan is a more appropriate tool to
have also concerningly been	achieve this.
removed.	
	The Authority will also support a strategic
	assessment and plan for tourism—the
	future 'Wet Tropics Tourism and
	Destination Plan'. This plan will be
	developed over the next 12 months with
	the full participation of the tourism sector.

4. Reducing impacts of community services infrastructure on values—The proposed amendments include enabling state government entities, in addition to local government, to apply for schedule 1 rezoning of zone B to zone C under the Management Plan. The proposed amendments to s.65 expand the requirements under the Management Plan for the Authority to decide an application only if there is no prudent and reasonable alternative or there is no net adverse impact on integrity of the Area. This now applies to all community service infrastructure, not just roads.

Summary of views

Support: Generally, there was support for additional scrutiny in the permit assessment process s.65. Submissions from the telecommunications industry recognise that permits may be issued for the maintenance of existing infrastructure in any zone. Rainforest Aboriginal Peoples submissions noted that cooperative management agreements (CMAs) will address community service infrastructure requirements while minimising impacts on the Area.

Concern: The telecommunications industry raised concerns regarding the controls of the current Management Plan and further controls imposed by amendments to s.65 limiting installation of new infrastructure. The conservation sector also raised concerns that schedule 1 rezoning for infrastructure may lead to incremental loss of zone A.

Table 4.1: Support—community cervices infrastructure

Submission 43	ubmission 43		
Issue	Authority's position	Authority's response	
Support an additional level of scrutiny in the permit assessment process for proposed new infrastructure that will not affect the integrity of the Area.	Agreed	No further comment.	
Submission 40			
Note that maintenance of community services infrastructure can occur in all	Agreed	No further comment (noting this is already the case under the current Management Plan).	

zones (permit still required)— this is a welcome inclusion.		
Submission 41 and 42		
The CMAS with the Authority will deal with community infrastructure, supporting essential services as required while minimising potential impacts of infrastructure on the values of the Area.	Agreed	The Authority supports CMAs as the preferred mechanisms for considering community service infrastructure requirements, particularly on Aboriginal freehold land.

Table 4.2: Concerns—community services infrastructure

Submission 34		
Issue	Authority's position	Authority's response
Recommend given the Authority's strategic objective of promoting tourism and the importance of telecommunications for safety and disaster response processes, that the Draft Plan should contain an exception to the proposed prohibitions in each zone to enable telecommunications infrastructure to be installed.	No change	It is not appropriate to make a specific exception in each zone to enable telecommunications infrastructure to be installed. The current and proposed amendments to the Management Plan already provide a mechanism to allow carriers to apply for a rezoning if alternative sites cannot be found. The mountain-top areas, often suitable for telecommunications infrastructure, are also some of the most diverse and vulnerable parts of the Area. Careful assessment of any proposal is required.
Recommend amending s.65 of the Draft Plan so that the constraints contained in it apply only to roadworks or infrastructure with a similar disturbance footprint rather than to all community services infrastructure more broadly.	No change	It is not appropriate to exempt telecommunications infrastructure from s.65, as any new activity must be assessed for its impacts on the values of the Area. It is reasonable that proponents demonstrate that there are no prudent and feasible alternatives to undertaking the proposed activity inside the Area or that there will no net adverse impact on the integrity of the Area.
Recommend creating a wider exemption in the Draft Plan that allows the undertaking of canopy clearing for the installation of any telecommunications infrastructure.	Agreed	The Authority's intent is that the proposed amendments to s.65 will provide adequate scope for canopy clearing associated with new telecommunications infrastructure. The Authority has included an additional provision under s.65 to address this matter. "3) Also, if the authority considers building the community services infrastructure or road is likely to require canopy clearing, the authority may issue the permit only if satisfied—

Recommend the power to make a rezoning application should be afforded to telecommunications carriers so that this power can be used to support and provide the spectrum of infrastructure contemplated by the definition of 'community service infrastructure'.	No change	(c) there is no prudent or feasible alternative to the canopy clearing for building the infrastructure or road." The opportunity to clear to access and maintain existing infrastructure has been clarified. Only local government and state agencies can access rezoning provisions under the proposed amendments to schedule 1. Note: Schedule 1 only applies to zone B. If there is no prudent and feasible alternative to locating infrastructure in zone A or B—a proponent may request that the Authority amend a zoning map under s.8 (s.17 proposed amendments). This process is set out under s.44, 45, 46 and 47 (1) & (2) of the Wet Tropics World Heritage Protection and Management Act 1993 (the Wet Tropics Act). The Authority may consider strategic rezoning approach in certain circumstances (i.e. where the need for multiple structures are identified, the Authority may consider a single process to rezone these areas, rather than multiple
Recommend that the Authority retain the current Management Plan definition of a road rather than adopting the narrower definition in the <i>Transport Operations</i> (Road Use Management) Act 1995 (Qld).	Agreed	processes). The previous definition of road was reinstated to ensure that the opportunity to access and maintain canopy around roads continues to apply in a similar way for community services infrastructure providers.
Submission 40 It is suggested that a mechanism be included that allows—subject to an appropriate level of information, justification of need and assessment rigour—that all areas of the Wet Tropics World Heritage Area be permitted to be considered for infrastructure should the need arise.	No change	It is not appropriate to make a specific exception in each zone to enable telecommunications infrastructure to be installed in any zone. The current and proposed amendment Management Plans already provide a mechanism to allow carriers to apply for a rezoning if alternatives cannot be found (S.8 current Management Plan and s.17 proposed amendments).
Submission 20 Concern over possible incremental loss of zone A and B land through the State and	No change	The opportunity to rezone land has not changed under the proposed amendments. The Management Plan continues to support the installation of essential and other

local government applications to rezone land from B to C. If land is rezoned from B to C, will land from zone A also be rezoned into B to allow a 50-500m buffer for the new zone C land?		community services infrastructure in appropriate locations and where there is not feasible alternative. There is no intention, when a rezoning is undertaken, to undertake a subsequent change to a buffering zone.
Recommendation 14— community services infrastructure needs to be limited to essential for the local community, not for tourism development. Extending power lines will further exacerbate habitat fragmentation and should be prohibited.	Agreed	Community service infrastructure is defined in the Management Plan Schedule 3—dictionary. In considering any proposal for developed visitor infrastructure, the Authority would also assess any associated infrastructure, such as powerlines, within the same permit consideration. For example, if a tourism development could be approved under permit, but the associated infrastructure could not, the Authority may require the applicant to propose a prudent and feasible alternative (i.e. on-site electricity

5. Permits for domestic activities—The proposed amendments will allow additional domestic activities under a permit such as electricity, water supply and communications. The changes also clarify that the Authority must issue a permit to build only one residence per allotment and may issue approval for more than one residence.

Summary of views

Support: Submissions from individuals supported the changes relating to permits for domestic activities where World Heritage Values were not impacted, and only for low impact electricity and water supply options (e.g. not connecting to the grid). A number of Rainforest Aboriginal Peoples submissions also note the changes to regulation of domestic activities.

Concerns: Some concern was raised in submissions from Rainforest Aboriginal Peoples regarding impact of the proposed changes on return to country aspirations that may involve construction of multiple dwellings.

Table 5.1: Support—permits for domestic activities

Submission 20		
Issue	Authority's position	Authority's response
Support the clarification in the draft amended Plan, giving the Authority discretion to refuse	Agreed	No further comment.

permits for additional residences on land.			
Individual submissions			
If residences are allowed, then it would seem only reasonable that a moderate level of domestic comfort be afforded. There should be no clearing for underground services or for towers with overhead lines.	Agreed	No further comment.	
Submission 41 and 42			
The Masterplan and the cooperative management agreements (CMA) will also underpin the Indigenous Land Use Agreement that will outline and regulate domestic activities. The Masterplan will identify all future residential areas and these areas will be zoned in consultation with the Authority and negotiated by way of CMA.	Agreed	The Authority supports the Masterplan and the CMA process as the preferred mechanisms for considering return to country aspirations and associated domestic activities.	
Submission 44			
The Authority's proposal to expand these activities to allow for the installation of electricity, water supply and communications for domestic purposes (with a permit) is welcomed.	Agreed	No further comment.	

Table 5.2: Concerns—permits for domestic activities

Submission 8		
Issue	Authority's position	Authority's response
The authority produces a guideline that defines how a Good Living Area is identified and the subsequent associated type, scale and intensity of permitted uses.	Agreed	The CMA guideline will provide information to guide the location of good living areas, but the scale and intensity of use will continue to be a negotiable component of the agreement.

Submission 44

The new proposals by the Authority is to only permit one residence per lot (with critical criteria for the approval of a subdivision), will diminish Traditional Owners aspirations to gain ownership and secure land tenure of individual allotments.

Interpretation issue

The interpretation that the changes to domestic activities—building additional residences mean that the Authority will only grant one permit for a residence per lot is incorrect.

The Authority's intent in the proposed amendments is to clarify that one dwelling per lot is guaranteed and that more than one dwelling per lot can be considered but is not guaranteed.

The Authority's preferred approach to reconfiguring a lot and community development aspirations more broadly is to adopt an Aboriginal led planning process, such as a strategic 'Master planning' process.

6. Recognising Rainforest Aboriginal tradition—The proposed amendments introduce a new section s.59 which requires stronger consideration of Aboriginal tradition during a permit assessment process. This has resulted in an update to existing s.62 consultation guidelines that require proponents to engage in a free prior and informed consent process. Proposed amendments include new provisions to state that cooperative management agreements (CMAs) must be depicted on zoning maps and clarified that CMAs prevail over the Management Plan zoning to the extent of the inconsistency. The Authority has clarified beyond doubt that the Management Plan does not affect native title rights (s. 211 of the *Native Title Act 1993*, Cwlth).

Summary of views

Support: There was a high level of support for better recognition of Aboriginal tradition in all submissions that addressed this matter. A number of submissions from Rainforest Aboriginal Peoples confirmed that the proposed changes did not impact on s.211 native title rights, and that their aspirations for community development would complement management and presentation of the World Heritage Area.

Submissions from Rainforest Aboriginal Peoples, individuals and the conservation sector, recommended that the better recognition of Aboriginal tradition, the development of a CMA guideline and the negotiation of CMAs should also ensure the protection of World Heritage Values.

Concern: Submissions from Rainforest Aboriginal Peoples raised detailed concerns regarding perceived shortcomings in the current CMA process, and principles and criteria for considering a CMAs.

Rainforest Aboriginal leaseholders raised concerns about the interaction of the zoning system and existing CMAs.

A Native Title Representative Body (NTRB) raised concerns regarding demonstration of free prior informed consent to the proposed amendments to the Management Plan and when deciding permits that may impact on Rainforest Aboriginal tradition. The NTRB also offered to collaborate with the Authority to refine the Free Prior Informed Consent Process detailed in the s.62 guideline.

Tourism peak bodies also submitted concerns regarding tenure resolution process occurring in Cape York Peninsula and Daintree National Park, noting that existing businesses and market need must be considered.

Table 6.1: Support—recognising Rainforest Aboriginal tradition

Issue	Authority's	Authority's response
	position	
Supporting the following comments: • high level of comfort that the Management Plan does not impact s.211 native title rights (Native Title Act 1993, Cwlth) • three submissions mentioned the future act notice—of these submissions none expressed the view that native title was impacted • support for stronger recognition of Aboriginal Tradition s.59 • support for the Strategic Plan, strategy 2 Support Rainforest Aboriginal Peoples. Some minor amendments were proposed to the text and actions under Strategy 2 • welcomed amendments to the Management Plan clarifying that cooperative management agreements (CMAs) prevail over the underlying zoning.	Agreed	The Authority also proposes to recognise s.59 (Aboriginal tradition) in proposed amendments to CMAs. The Authority will also incorporate proposed changes to the Strategic Plan.
Submission 33 Supporting the following	Agreed	The Authority welcomes the opportunity to
 recognise the consultation effort of the Authority extend an offer to collaborate further in the development of guidelines particularly relating to Free Prior and Informed Consent. 	Agreeu	collaborate further on the review of permit assessment guidelines for consultation with Aboriginal Peoples particularly concerned with the land.

Submission 41 and 42		
Issue	Authority's position	Authority's response
We have made our ambitions clear to preserve country in a culturally environmentally way that creates community development activities that are mutually beneficial, and protect, conserve, rehabilitate, present and transmit to future generations of the World Heritage Area.	Noted	The Authority is supportive of community development planning which recognises the importance of World Heritage values.
Other submissions		
Support better recognition of Aboriginal tradition, however this should ensure no adverse impacts on World Heritage values.	Agreed	Having regard to Aboriginal Tradition is a component of the Wet Tropics Act, the introduction of new s59 into the Management Plan means that Aboriginal Tradition will be considered along with other matters such as WHV, integrity and community considerations.

Table 6.2: Concerns—recognising Rainforest Aboriginal tradition

Submission 8, 24, 41 and 42		
Issue	Authority's position	Authority's response
Request additional changes to support CMAs: CMAs to include statutory guidelines including principles against which a CMA may be assessed ability to amend a CMA dispute resolution options clarify relationship between subdivision under a permit and subdivision under a CMA	Agreed	The Authority supports the recommendation to develop statutory CMA guidelines. Note: the CMA guideline cannot be finalised until the Management Plan amendments take effect, because the current plan does not contain the relevant head of power. The new CMA Guidelines are being developed with Rainforest Aboriginal Peoples, and changes to the Management Plan will clarify: • principles against which a CMA will be assessed • relationship between subdivision and CMAs • ability to amend a CMA agreement • dispute resolution process • relevant court for appeals.
Submission 26 and 48		
The Authority's proposal to move to a joint managed model of operation based on Cape	Interpretation issue	The interpretation that the Authority has specifically proposed moving towards a CYPAL

York Peninsular Aboriginal Land (CYPAL) model, underpinned by park specific Indigenous Management Agreements) may jeopardise current tourism operations.		joint management model in the Wet Tropics is incorrect. The Authority is supportive of providing appropriate opportunities for Rainforest Aboriginal Peoples to have meaningful involvement in the management of the Wet Tropics World Heritage Area, whether this be a CYPAL model of joint management or other mechanisms.
Concerned that the draft s.62 permitting guidelines are not currently adequate. Extend an offer to collaborate further in the development of guidelines particularly relating to Free Prior and Informed Consent (FPIC).	Agreed	The Authority has commenced consultation in good faith with Rainforest Aboriginal Peoples and interested organisations regarding the draft s.62 guideline for consulting with Rainforest Aboriginal Peoples. Suggestions have been received from a Native Title Representative Body for amendment of the Guideline to strengthen the provisions for FPIC. The Authority welcomes the offer of support to achieve best practice FPIC procedures that satisfy the United Nations Declaration on the Rights of Indigenous Peoples and World Heritage management principles. The Authority will also work with the Traditional Owner Leadership Group, and through regional forums to ensure the involvement of Rainforest Aboriginal Peoples in the finalisation of the guideline.
Submission 44 Oppose the changes to the underlying zoning within the pink zone areas. The change to zone A may limit ability to undertake community development and commercial activities.	Agreed	The Authority has clarified in the proposed amendments that the CMA prevails over the zoning to the extent of the inconsistency. The Authority will continue discussions to ensure these concerns are resolved.

7. Roads—The proposed amendments to the zoning maps align the road hierarchy in the Management Plan with state and local government system. Amendments also remove regulatory duplication by no-longer issuing permits on roads already managed by Queensland Parks and Wildlife Service. The Authority will continue to issue permits on lawful access roads for certain activities (e.g. access and maintenance for community service infrastructure providers and access for conservation and research purposes). The proposed amendments remove unmaintained roads from zoning maps but retain these in a list of 'potential future presentation roads' in the Strategic Plan for future consideration. Any application to open a new road would be subject to the approval of the relevant land manager and a permit assessment process. Any proposal would be subject to the

principles and criteria for deciding permit applications, including the community need for the activity.

Summary of views

Support: Generally, there was support from all submitters for the proposal to reduce duplication in permit requirements and simplifying the road hierarchy. Rainforest Aboriginal Peoples submissions noted the proposed changes to roads and acknowledged that future development of road or access track development on Aboriginal freehold may be negotiated under cooperative management agreements (CMAs). The Department of Transport and Main Roads raised no concerns regarding the new hierarchy.

Concern: Peak tourism bodies were concerned by the removal of roads from zoning maps and requested further consultation prior to removal from zoning maps. Individual submissions and submissions from the conservation sector, raised concern that unmaintained roads should be permanently rehabilitated and not considered for future use by vehicles.

Submissions from some Rainforest Aboriginal Peoples and a local government requested an audit of roads in their area to ensure all local government roads are zoned appropriately to ensure these are available to support return to county aspirations.

A community service infrastructure provider recommended that road reserves should be removed from the World Heritage Area to remove permitting requirements in these disturbed areas.

Table 7.1: Support—roads in the Wet Tropics World Heritage Area—a simpler system

Submission 26		
Issue	Authority's position	Authority's response
The road classification amendments are supported by stakeholders as are the removal of permit duplication.	Agreed	No further comment.

Table 7.2: Concerns—roads in the Wet Tropics World Heritage Area—a simpler system

Submission 18		
Issue	Authority's position	Authority's response
Recommend that roads (road reserves) be removed from the Wet Tropics World Heritage Area to improve efficiencies of infrastructure management within road corridors. Alternatively, roads on the perimeter of the area should be removed.	No change	The Authority does not support removing road reserves from the World Heritage Area. Amendments to the boundary of the Area are a major process (i.e. a change to the World Heritage listing) that is outside of the scope of the current review process. The Authority welcomes further collaboration to improve the infrastructure maintenance permit
Siloulu de l'effloved.		processes.

Object to the removal of roads from zoning maps without further consultation.	No change	The Authority will retain roads with tourism potential on a map in the Strategic Plan, recognising their future potential, and has established a process for proposed re-opening.
Submission 49		
Recommendation 11—no opening of old or new roads without extensive consultation.	Noted	Any application to open a new road would be subject to the approval of the relevant land manager and a permit assessment process. The permit assessment process includes community considerations, and the Authority would direct the applicant to consult all relevant parties.
Submission 21		
Request that the Authority change the current zoning adjacent to Southedge Road to zone C along its entire length. Alternatively retain existing zoning (predominantly zone B) and strongly oppose the proposed change in zoning classification from zone B to zone A.	No change	Only public roads have an adjacent zone C. It would be inconsistent with the Management Plan to establish a zone C adjacent to a road that exists for management purposes only. Retaining the existing zoning (a mixture of zone A, B and C) would be inconsistent with the Authority's approach to other management of roads which do not have an associated zone C or zone B. The decision to amend zone B areas to zone A reflects the management intent for the area in which Southedge Road is located.

8. Undesirable plants and animals—The proposed amendments update the undesirable plant and animal schedule to avoid duplication with *Biosecurity Act 2014*. Amendments also include conditions for keeping of dogs, cats and honey bees. Dogs and cats may be kept provided that they are kept in a certain way (e.g. comply with the relevant local laws and minimises threat to native animals). The amendments also allow the Authority to prepare a guideline about the way dogs and cats may be kept. The proposed amendments confine grazing only to cattle, and this is only an allowed activity outside a rainforest. The amendments clarify that keeping of an undesirable animal is no longer an allowed activity and established transitional provisions for landholders that may be affected.

Summary of views

Support: A number of Rainforest Aboriginal Peoples submissions support the creation of conditions for the keeping of dogs, cats and honey bees. These submissions also note that there is a desire to support the Authority to undertake compliance and monitoring. Some submissions from the conservation sector indicates a preference for prohibition of dogs and cats from the Area but also recognises that the Authority's position on dogs and cats may be an acceptable compromise.

Concern: Submissions from individuals and the conservation sector, raise concerns that the proposed amendments do not go far enough in managing the impacts of dogs and cats on native

wildlife. Several submissions also raise concerns about the Authority's capacity to enforce the new provisions and questioned the Authority's role in the management of feral pigs.

Table 8.1: Support—undesirable plants and animals

Subdivision 41 and 42		
Issue	Authority's position	Authority's response
Support the list of undesirable plants and animals in the area and proposed conditions for the keeping of dogs, cats and honey bees.	Agreed	No further comment.
Ongoing compliance and monitoring role for Traditional Owners in relation to keeping of dogs and cats and presence of undesirable animals, particularly in supporting active CMAs.	Noted	The Authority thanks the submitters for identifying this opportunity to support the management of the World Heritage Area.
Submission 20	1	'
The draft amended Plan retains the ability to keep a cat or a dog in compliance with local laws and in a manner that minimises relevant risks. Recommend that the keeping of dogs and cats be prohibited in the Wet	Agreed	The Authority recognises the potential impact of domestic dogs and cats on native animals, however if properly kept, their impact can be minimised. The proposed amendments retain the ability to keep a dog or cat in compliance with local laws and in a manner that minimises relevant risks.
Tropics World Heritage Area, however we are of the view that this is an acceptable compromise.		The proposed amendments include a provision to develop a guideline about the ways a god or dog may be kept.
However, adequate resources for enforcement must be allocated to ensure compliance.		The Strategic Plan also supports strategic compliance activities with Rainforest Aboriginal Peoples, local government and other relevant organisations.

Table 8.2: Concerns—undesirable plants and animals

Individual submissions		
Issue	Authority's position	Authority's response
Dogs and cats should not be allowed in the World Heritage Area or should be de-sexed.	No change	The Authority recognises the potential impact of domestic dogs and cats on native animals, however if properly kept, their impact can be minimised.

The proposed amendments retain the ability to
keep a cat or a dog in compliance with local laws
and in a manner that minimises relevant risks.

9. Reconfiguring a lot—The proposed amendments require assessment of any subdivision of a lot within the Area by the Authority to manage the location and extent of subdivision and resulting housing. It also provides opportunity to condition approvals in a way that reduces fencing impacts on wildlife movement and similar matters. For subdivision on Aboriginal land, the Authority may also consider approvals through other planning processes such as a cooperative management agreement (CMA).

Summary of views

Support: Submissions from individuals generally supported tighter control of subdivision within the World Heritage Area by the Authority to ensure World Heritage values are protected. Submissions from Rainforest Aboriginal Peoples noted the intent to regulate subdivision and support the use of CMAs to consider future requirements for subdivision as part of community development aspirations.

Concerns: Some individual submitters asserted that there should be no further subdivision within the Area, and requested the Authority further consider opportunities to manage the impacts of subdivision adjacent to the World Heritage Area through improved relationships with all relevant local governments.

Some submissions from Rainforest Aboriginal Peoples recommend the Authority tighten the linkage between permitting reconfiguring a lot, permits for domestic activities and CMAs.

A state government department noted that reconfiguring a lot is already regulated under the *Planning Act 2016*, however were satisfied that the proposed process to deal with this in the Wet Tropics of Queensland World Heritage Area was not onerous, and was necessary to effectively manage the Area. It was further recognised that the Wet Tropics Act s.85(2)(m) contains provisions allowing the regulation of reconfiguring a lot through the Management Plan.

Table 9.1: Support—reconfiguring a lot

Individual submissions		
Issue	Authority's position	Authority's response
The Authority must have and exercise absolute control over subdivision of land in the Wet Tropics World Heritage Area and over activities undertaken on such land.	Agreed	No further comment.
Submission 41 and 42		
We understand the Masterplan, CMA and Town Planning Scheme will finalise and address impacts [of a subdivision] on the Area.	Agreed	The Authority will continue to support the master planning process to ensure that it also meets the requirements of a CMA.

To assist with reducing duplication the we will also be seeking for the Masterplan (Local Area Plan) to be included into the Town Planning Scheme.		
Submission 8		
Recommend that the Authority tighten the linkages between s.33(q)permit requirements for reconfiguring a lot and s.63, domestic activities, of the draft Management Plan 2019 and the outcome of any community development plans to ensure transparency in decision making. Specifically, linking the outcomes of a Master Plan (map with lot layout) that has been created using the approved process outlined into the statutory guidelines to s33(q). Note: s.33(r) in consultation v23 is s.33(q) in the final v39.	Agreed	The Authority is proposing changes to the existing Management Plan that will clarify the relationship between CMAs and ongoing permits for houses and allotments (domestic activities). The assumption in that the proposed changes do not allow more than one dwelling per allotment is a misinterpretation. The proposed amendments clarify that one dwelling per lot is guaranteed and that more than one dwelling per lot can be considered but is not guaranteed. The proposed guideline and proposed amendments to the Management Plan will provide better transparency.

Table 9.2: Concerns—reconfiguring a lot

Submission 27		
Issue	Authority's position	Authority's response
Seek further discussions regarding regulation of development which is already regulated under the <i>Planning Act 2016</i> .	No change	Discussions were held and a mutually agreed resolution was reached. The need for Management Plan controls over reconfiguring a lot was accepted. The Authority has proposed a practical approach to regulating subdivision. Amendments to the Wet Tropics Act, and changes to the Land Title Act 1994 will be required to achieve titling requirements.

10. Other issues considered (mining and offsets)—The Authority will not apply offsets, acknowledging that there are two offsets policies that apply the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* Environmental Offsets Policy and Queensland

Environmental Offsets Policy established under the *Environmental Offsets Act 2014, Environmental Offsets Regulation 2014.* This approach is consistent with the approach for the Great Barrier Reef World Heritage Area and the Tasmanian Wilderness World Heritage Area. The Authority has maintained the capacity to apply particular conditions on permits that can prevent or minimise any adverse impacts. The Management Plan will articulate this more clearly by including a provision that will enable conditions on permits that will contribute to achieving the primary goal, including, for example, by carrying out the proposed activity in association with another activity (an associated activity).

Mining is currently allowed under the Management Plan, this cannot be amended until mining is removed from the *Wet Tropics World Heritage Protection and Management Act 1993* (the Wet Tropics Act). The Authority is committed to seeking amendments to the Wet Tropics Act once the Management Plan review is complete.

Summary of views—offsets

Support: Some submissions noted that many small-scale impacts could contribute to cumulative decline of World Heritage values and supported the Authority's approach to impose conditions under the current permit approval process. Some Rainforest Aboriginal Peoples submissions also sought support from the Authority to be able to claim environmental offsets on their land within the World Heritage Area.

Concerns: Submissions from the conservation sector raised concerns that offsets should not be considered unless absolutely necessary to accommodate essential community services infrastructure.

Table 10.1: Support—offsets

Submission 41 and 42	Submission 41 and 42		
Issue	Authority's position	Authority's response	
Interested in claiming environmental offsets under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) and appreciates clarification on how to achieve this outcome.	Noted	The Authority will seek to ensure any offsets required under Commonwealth or Queensland Environmental Offsets Policy are directed to restoring and enhancing world heritage values in the Area. The Authority will support registered native Title bodies corporate (RNTBC) to explore involvement in these works.	
Submission 20			
We recommend that the Authority implement an offsets policy for small-scale impacts to ensure there is no net loss to the Wet Tropics World Heritage Area. This may be done through imposing conditions under the current permit approval process.	Noted	No further comment.	

Table 10.2: Concerns—offsets

Individual submissions		
Issue	Authority's position	Authority's response
Opposed to the use of offsets within or adjacent to the Wet Tropics World Heritage Area for any private commercial interests.	Noted	The Authority is not contemplating offsets as part of its permit approval process.
Offsets should hardly ever be contemplated. They are the bottom of the barrel in terms of management.	Noted	The Authority is not contemplating offsets as part of its permit approval process.

Summary of views—mining

Support: All submissions relating to mining strongly supported the authority making the necessary changes to the Wet Tropics Act. Two RNTBCs and a State Government Department provided a submission supporting future removal of mining from the Wet Tropics Act.

Concerns: None.

Table 10.3: Support—mining

Submission 41 and 42		
Issue	Authority's position	Authority's response
Do not support mining within our Trustee Area or native title determination area and supports the Authority to seek amendments to the Wet Tropics Act to prohibit mining.	Noted	No further comment.
The Department has identified issues with the potential for future removal of mining as an allowed activity under the Wet Tropics World Heritage Protection and Management Act 1993 s.56(1) (b) and the Management Plan. The Department is available to continue engagement with the Authority on this matter to ensure consistency across jurisdictions.	Noted	The Authority thanks the Department for their offer of support in resolving this matter.

Section two: Full consultation report—phase two

This section is a summarised record of all submissions and includes the Authority's position and response to the matters raised.

Submissions are presented in the following order:

- 1. State and local government—including community service infrastructure providers and government owned corporations
- 2. Private community service infrastructure providers
- 3. Rainforest Aboriginal Peoples
- 4. Conservation sector
- 5. Tourism sector
- 6. Individual submissions

The content of the table in Part B is detailed in the table structure below.

Table structure

Submitter

Note: reference to specific sections of the proposed amendments should be considered a reference to the final draft Wet Tropics (Review) Amendment Management Plan 2020v39, unless otherwise indicated. This version includes the amendments undertaken post consultation.

		·
Issue	Authority's position	Authority's response
Summary of the matters raised in each individual submission. The matters raised have been organised according to the themes in the phase two consultation brochure.	Indicates how the matter is being addressed by the Authority.	Outlines the Authority's considerations and any action the Authority has subsequently taken in response to the comment(s) raised. Responses include proposed further amendments to the Management Plan; follow-up consultation with the submitter to discuss the issue raised; deciding not to make any amendment as the comment was in support of the Consultation Draft, or the change proposed by the submitter was not acceptable to the Authority.

Authority's position—glossary of terms:

Agreed—the Authority proposes a change to the Strategic Plan, Management Plan or zoning maps resulting from the submission.

No change—this signifies that the Authority acknowledges the concern expressed by the submitter but there has been no corresponding change to the Strategic Plan, Management Plan or zoning maps.

Noted—the Authority acknowledges the support of the submitter.

Interpretation issue—the Authority considers that there has been a misunderstanding by the submitter about the matter raised.

1. Submissions from state and local government (including government owned corporations)

Submission 13		
Submission	Authority's position	Authority's response
Where a road is located in proximity or adjacent to the boundary of the Wet Tropics World Heritage Area, appropriate zones should be generated inside the World Heritage Area.	Agreed	 The Authority has resolved these issues with the submitter. The proposed amendments to the Management Plan already include provisions that can support ongoing maintenance of most of these roads: amending a zoning map s.15(1)(d) (minor amendment to zone boundary) in all zones a permit may be issued for an activity for protecting the lives or property other than an activity carried out in an emergency. Zoning rule exception: The Authority proposes an exception to zoning rules for a 100m section of the Cook Highway at Pebbly Beach. In this section, the road which is in close proximity to the boundary of the Area will generate a zone C buffer inside the Area. The Authority will work to manage any future impacts on the Area through a permit process.
Clarify if a cycling track/active transport path within a road reserve will be considered part of road infrastructure or 'limited visitor infrastructure'.	Agreed	The Authority will consider the active transport path as part of the road infrastructure where it is located within the state-controlled road reserve and runs in parallel with the state-controlled road.
Clarify how temporary stockpiling sites (landslips) are considered—e.g. part of the road infrastructure or a 'waste facility', prohibited under s.26(1)(h)&(i).	Agreed	The Authority can clarify beyond doubt that temporary stockpiling sites are considered part of the road infrastructure. Road maintenance permits provide more detail regarding management of specific stockpiles.
Submission 28		· · · · · · · · · · · · · · · · · · ·
Support removal of mining as an allowed activity under the Wet Tropics Act.	Noted	The Authority acknowledges the support of the department and will seek further advice when the Wet Tropics Act is reviewed.
Support development of Strategic Plan, specifically strategies 1 (climate change and other threats) and 5 (minimise impacts) under the Strategic Plan. Welcomes	Noted	The Authority acknowledges the support of the department.

further discussion where there may be shared jurisdictional interests.		
Submission 27		
Seek further discussions regarding regulation of development which is already regulated under the <i>Planning Act 2016</i> .	No change	Discussions were held and a mutually agreed resolution was reached. The need for Management Plan controls over reconfiguring a lot was accepted. The Authority has proposed a practical approach to regulating subdivision. Amendments to the Wet Tropics Act, and changes to the Land Title Act 1994 will be required to achieve titling requirements.
Submission 4		
Supports the current version of the Plan as it relates to the State's tourism interests, particularly concerning the additional flexibility offered through the Plan in relation to establishing new tourism opportunities and additional visitor infrastructure in all zones of the Wet Tropics World Heritage Area.	Noted	The Authority acknowledges the support of the department.
Supports the Authority's vision to promote this renowned area to tourists, which supports the State's vision for growing ecotourism/nature-based experiences in Queensland.	Noted	The Authority acknowledges the support of the department.
Submission 18		
Recommend that roads (road reserves) be removed from the Wet Tropics World Heritage Area to improve efficiencies of infrastructure management within road corridors. Alternatively, roads on the perimeter of the area should be removed.	No change	The Authority does not support removing road reserves from the Area. Amendments to the boundary of the Area are a major process (i.e. a change to the World Heritage listing) that is outside of the scope of the current review process. The Authority welcomes further collaboration to improve the infrastructure maintenance permit
		processes.
All electricity Infrastructure reflected in management plan zoning.	Agreed	The Authority has carried out an audit to reflect all Energy Queensland Infrastructure in the amended zoning maps.
Submission 25		
Request increase the Kuranda Scenic Rail upper	No change	The Authority has resolved these concerns with the submitter. The Authority will retain the

slope zone C buffer to 250m to accommodate slope stabilisation works in the near future.		proposed 100m zone C buffer on the upper slopes of the Kuranda Scenic Rail. The Authority believes proposed amendments to the Management Plan provide other mechanisms to accommodate future proposed slope stabilisation. These include: • Amending a zoning map s.15(1)(d) (minor amendment to zone boundary) • In all zones a permit may be issued for: o s.33(1)(h) an activity for protecting the life of, or preventing injury to, a person, other than an activity carried out in an emergency; o s.33(1)(i) an activity for the protection,
		other than the urgent protection, of
Request inclusion under Schedule 1 rezoning provisions.	Agreed	property. The Authority confirms that access Schedule 1 is allowed for a state government entity.
Supports the introduction of the Wet Tropics Strategic Plan addressing priority community issues.	Noted	The Authority thanks the department for its support.
Submission 32		
Thank you for the opportunity to review and comment on the Wet Tropics Management Plan Review—Phase 2.	Noted	The Authority thanks the council for their support.
Submission 14		
The council recognises that the Authority has considered Traditional Owner aspirations in the Plan, provided a number of 'Rainforest Aboriginal Peoples' factsheets and liaised directly with a number of groups who hold existing CMAs.	Noted	No additional comment.
Request that existing water intake locations are not rezoned from zone B to zone A. All areas of the listed water intakes which are not zone C are requested to remain zone B.	Agreed	The Authority has undertaken an assessment of all water intakes to ensure that they are zoned appropriately. The Authority introduced an exception to zoning rules for water intake infrastructure. Water intakes will now generate a zone B buffer. This will enable local government to apply for a future rezoning from zone B to zone C to accommodate future essential community

		service infrastructure that cannot be accommodated within the existing zone C area.
Concern is that if recreational tracks and trails are not represented on zoning maps there will no longer be a comprehensive public overview of all tracks and trails located within the Area.	No change	Walking trails are not shown on zoning maps. Individual Land Managers such as Queensland Parks and Wildlife Service show walking track on their website and other published material. The proposed changes simplify the road classification system and reduce red tape by removing duplication in the permitting process.
Request further information on the types of 'visitor infrastructure' which would be allowable in zones A, B and C of the Plan. Request that the Authority review and accommodate for the proposed Wangetti Trail alignment and associated infrastructure, which has been recently released by the state government.	Agreed	The Authority has clarified the types of infrastructure allowed in each zone: • all zones: 'Limited visitor infrastructure'. • zone C: in addition to community service infrastructure it is proposed to add 'Developed visitor infrastructure'. (These terms are defined in the proposed amendment to the Management Plan.) The Authority is working with a number of state government departments, local governments and Rainforest Aboriginal Peoples to consider the requirements of the proposed Wangetti Trail.
Request that Zig Zag Road and 10 Mile Road are classified as a local government roads. These roads provide the only access to a number of residents.	Agreed	The Authority has identified these roads as local government roads and zoned them appropriately.

2. Submissions from private community service infrastructure providers

Submission 34		
Submission	Authority's position	Authority's response
The Draft Management Plan should contain an exception to the proposed prohibitions in each zone to enable telecommunications infrastructure to be installed.	No change	This request is not about the proposed amendments it is a request to change the underlying function of the existing Management Plan. It is not appropriate to make a specific exception in each zone to enable telecommunications infrastructure to be installed, as we note that the current Management Plan and proposed amendments already provide flexibility to allow carriers to apply for a rezoning.

		Any application for new infrastructure within the Area must be assessed to ensure that it does not negatively impact on the World Heritage values of the Area. If there is no prudent and feasible alternative to locating infrastructure in zone A or B—a proponent may be able to work with the Authority to amend a zoning map under s.8 (s.17 in the amendments to the Management Plan).
Recommend amending s65 of the Draft Plan so that the constraints contained in it apply only to roadworks or infrastructure with a similar disturbance footprint rather than to all community services infrastructure more broadly.	No change	It is not appropriate to exempt telecommunications infrastructure from s.65, as any new community services infrastructure activity must be assessed for its impacts on WHV and integrity of the Area. All proposals for new community service infrastructure must demonstrate that there are no prudent and feasible alternatives or that there will be no net adverse impact on the integrity of the Area.
Recommend creating a wider exemption in the Draft Plan that allows the undertaking of canopy clearing for the installation of any telecommunications infrastructure.	Agreed	The Authority's intent is that the proposed amendments to s.65 will provide adequate scope for canopy clearing associated with new telecommunications infrastructure. The Authority has included an additional provision under s.65 to address this matter. s.65(3) Also, if the authority considers building the community services infrastructure or road is likely to require canopy clearing, the authority may issue the permit only if satisfied— (c) there is no prudent or feasible alternative to the canopy clearing for building the infrastructure or road.
Recommend incorporating more flexibility into the Draft Plan and zoning maps to have regard for the community services infrastructure already within the Wet Tropics World Heritage Area. The Authority should treat the existing optic fibre and cable infrastructure within the Area as linear infrastructure so that the surrounding land is included within zones B or C (as appropriate).	No change	The fibre optic cable in question, was permitted as minor and inconsequential development because it was instated via underground drilling (i.e. did not require rezoning to zone C). It is not appropriate to then apply zone C, which will result in the opportunity to impact an area where facilities were originally agreed to, and installed with virtually no impact. The Authority proposes to recognise all relevant existing community service infrastructure on zoning maps.
Recommend roads providing access to infrastructure	No change	Access roads that are not State-controlled roads, local government roads or local access roads, will

should be included in the zoning maps accompanying a Draft Plan to enable their ongoing use.		not be shown on zoning maps. However, infrastructure maintenance permits ensure necessary access is maintained for infrastructure providers.
Recommend that the Authority retain the current Management Plan's definition of a road rather than adopting the narrower definition in the Transport Operations (Road Use Management) Act 1995 (QLD).	Agreed	The Authority has reverted to the current Management Plan definition of a road. Schedule 3—Dictionary will define road as: "(a) includes— (i) a vehicular track, bridge or causeway; and (ii) a constructed carpark; but (b) does not include a walking or cycling track."
Recommend the power to make a rezoning application should be afforded to telecommunications carriers so that this power can be used to support and provide the spectrum of infrastructure contemplated by the definition of 'community service infrastructure'.	No change	Only local government and state agencies can access rezoning provisions under the proposed amendments to schedule 1. Note: Schedule 1 only applies to zone B. If there is no prudent and feasible alternative to locating infrastructure in zone A or B—a proponent may request that the Authority amend a zoning map under s.8 (s.17 proposed amendments). This process is set out under s.44, 45, 46 and 47 (1) & (2) of the Wet Tropics Act. The Authority may consider strategic rezoning approach in certain circumstances (i.e. where the need for multiple structures are identified, we may consider a single process to rezone these areas, rather than multiple processes).
Recommend the Draft Plan treat telecommunications more flexibly than other types of infrastructure which tends to be more static (in terms of technological change) such as roadworks, electricity supply and water supply.	No change	Any application for new infrastructure within the Area must be assessed to ensure that it does not negatively impact on the World Heritage values of the Wet Tropics of Queensland World Heritage Area. It is not appropriate to exempt any kinds of infrastructure from these requirements.
Submission 40		
Recommend an improved zoning system. Given zone A allows for 'visitor infrastructure' but not 'community services infrastructure' and the more than 75% increase in land	No change	Carriers can maintain existing infrastructure in all zones. An application may be made to install new community service infrastructure in zone C under a permit.
area proposed to be included I zone A by the changes, it follows that this will likely have a significant impact on		Mechanisms exist under the current Management Plan and the proposed amendments to request the Authority undertake a rezoning process if prudent and feasible

the MCF's members' ability to maintain and upgrade existing infrastructure and install new infrastructure where required. Zone B is intended to provide a 'buffer' between zone A and zone C but still does not allow for 'community services infrastructure' and is equally problematic. It is suggested that a mechanism be included that allows—subject to an	No change	It is not appropriate to make a specific exception in each zone to enable telecommunications infrastructure to be installed. The current and
appropriate level of information, justification of need and assessment rigour—that all areas of the World Heritage Area be permitted to be considered for infrastructure should the need arise. This would circumvent the need for a complicated (and therefore costly and timeconsuming) regime to allow for rezoning applications or the like and allow for greater discretionary against the background of an agreed framework.		proposed amendments to the Management Plan already provide a mechanism to allow carriers to apply for a rezoning if alternative sites cannot be found. The mountain-top areas, often suitable for telecommunications infrastructure, are also some of the most diverse and vulnerable parts of the Area. Careful assessment of any proposal is required.
Community service infrastructure—being a World Heritage Area, carriers cannot rely on the extensive powers granted to them by the Commonwealth under the Telecommunication Act, which normally allow for a range of inspection, installation and maintenance activities to occur in the World Heritage Area.	No change	The provisions under the Management Plan remain unchanged and carriers can maintain existing infrastructure in all zones. For new infrastructure see response above. A carrier must exercise their powers under the Telecommunications Act 1997 in a manner that is consistent with Australia's obligations under a listed international agreement relevant to the activity.
There is a need to maintain existing levels of service but provide improvements, upgrade and expansions as needed, the MCF has a keen interest in ensuring the management and approval	No change	The Authority acknowledge MCF concerns regarding the needs of mobile carriers. The current Management Plan and the proposed amendments provide mechanisms to accommodate ongoing maintenance of existing infrastructure and timely consideration of new

regimes are sufficiently rigorous to achieve their objectives but not so onerous that the deployment of suitably designed and sited infrastructure is delayed or impossible.		infrastructure in zone C and other zones through a rezoning process.
Note that maintenance of community services infrastructure can occur in all zones (permit still required)—this is a welcome inclusion and recognises the overlap.	Noted	No further comment.
Proposed changes to s.34 that will explicitly allow for the building of community services infrastructure in zone C does help to acknowledge the likelihood of the need for further infrastructure in the future.	Noted	No further comment.
Although the s.33 and s.34 changes are welcome recognition of the need to maintain and build infrastructure, it remains likely that the vast areas proposed to be covered by zone A will impact on locations for future infrastructure, even if that can't be determined or described at the moment.	No change	If there is no prudent and feasible alternative to locating infrastructure in zone A or B—a proponent may be able to work with the Authority to amend a zoning map under s.8 (s.17 in the proposed amendments to the Management Plan). This process is set out under s.44, 45, 46 and 47 (1) & (2) of the Wet Tropics Act and requires public notification, submission to ministerial Council and approval by Governor in Council.
Another issue to consider is the telecommunications are an essential for of infrastructure and there is, and will continue to be, need for their provision despite the inevitable physical impact.	No change	The Authority is confident that the current Management Plan and the proposed amendments provide mechanisms to accommodate ongoing maintenance of existing infrastructure and timely consideration of new infrastructure in zone C. See also response above.

3. Submissions from Rainforest Aboriginal Peoples

Submission 8		
Submission	Authority's position	Authority's response
Recommend that the Authority tighten the linkages between s.33(q) permit requirements for reconfiguring a lot and s.63, domestic activities, of the draft Management Plan 2019 and the outcome of any community development plans to ensure transparency in decision making. Specifically, linking the outcomes of a Master Plan (map with lot layout) that has been created using the approved process outlined into the statutory guidelines to s33(q). Note: s.33(r) in consultation v23 is	Agreed	The Authority is proposing changes to the existing Management Plan that will clarify the relationship between cooperative management agreements (CMAs) and ongoing permitting for houses and allotments. The interpretation that the current proposed changes do not allow multiple dwellings is incorrect. The changes clarify that the Authority must issue a permit to build one residence per allotment only; and may issue approval for more than one residence. The proposed guideline and amendments to the Management Plan will provide better transparency.
s.33(q) in the final v39. Recognising Aboriginal tradition—recommend that the Authority amend the draft Management Plan to include statutory guidelines for the preparation of CMAs that result in a Master Plan. Community Development Plans (CDP) and Activity Guidelines (AG) that underpin a Master Plan need to be clearly defined with emphasis on differentiating between circumstances that necessitate a CDP and others that require an AG.	Agreed	 The Authority agrees to develop a statutory guideline relating to s.41 (CMAs) under amendments to the Management Plan: the amendments includes a provision s.42(4) which allows the authority to create a statutory guideline for CMAs the Authority will commence developing this draft guideline immediately, but the guideline will not have statutory effect until the amended Management Plan is approved the Authority welcomes further discussion about the process to develop this guideline, and any steps the Authority can take in the interim to support return to country planning processes.
Recognising Aboriginal tradition—recommend that the draft Management Plan statutory guidelines must clearly define what it expects from the 'Master Planning process' and the final format of the Master Plan to ensure	Agreed	 The Authority can achieve this through: clarification in the CMA section of the amended Management Plan the remainder of the detail sought will be delivered through the statutory guideline

that both parties enter into the process with the same understanding of the attributes to be assessed in the process and the acceptable outcomes(s). This must also include a process within the draft Management Plan that details that process to amend, vary and appeal provisions of an agreed upon Master Plan.		 a non-mandatory CMA template will provide guidance on the process to amend or vary a CMA and about appeals a 'master planning' process will not be dictated as it precludes the opportunity for groups to use existing developed plans. A Master Plan is one example of a variety of Aboriginal planning processes that may be recognised as a CMA.
Recognising Aboriginal tradition—recommend that the Authority include a section within the draft Management Plan to guide the amendment, variation and appeal process associated with the Community Development Plan.	No Change	As is the current arrangement, these sections are included in the CMA, this enables both parties to agree to the terms rather than be dictated through the Management Plan.
Recognising Aboriginal tradition—recommend that the Authority include a section within the draft Management Plan to guide the amendment, variation and appeal process associated with an Activity Guideline.	No Change	As discussed above, this forms part of any CMA agreement and should not be dictated through the Management Plan.
Recognising Aboriginal tradition—recommend that the Authority create a CMA template pursuant to the draft Management Plan, that is specifically related to the master planning process and resultant plan(s).	Agreed	Work has commenced on the draft template. All Rainforest Aboriginal Peoples will be consulted on this template to ensure it is applicable to a variety of Aboriginal planning processes and tools, including Master Plans.
Recognising Aboriginal tradition—recommend the Authority produce a guideline that defines how a Good Living Area is identified and the subsequent associated type, scale and intensity of permitted uses.	Agreed	The CMA guideline will provide information to guide the location of good living areas, but the scale and intensity of use will continue to be a negotiable component of the agreement.
Seek formal (statutory) guidelines from the Authority within the Management Plan that describe how a CDP is created including the assessment criteria that is	Agreed	Better guidance will be given through amendments to CMA s.41 and s.42 of the Management Plan and through the statutory guideline and permitting guidelines.

used to make decisions about the protection of Integrity, scenic amenity and carrying capacity (amongst other matters) and the role and content of the Activity Guidelines.		
The draft Management Plan requires statutory recognition of the process underpinning Clause 9–14 of CMA#40 with the Planning and Environment court (refer to Clause 14.1 of CMA #40). Recommend that the Authority include a section within the draft Management Plan to give the Planning and Environment Court power to make decisions in relation to matters arising out of CMAs.	Agreed	CMAs can deal with many different matters, not just land-use planning and development. It is the Authority's understanding that the relevant court is largely dictated by the purpose for which the CMA is sought and must be identified within each individual CMA. However, it is proposed to identify in the Management Plan that for disputes arising under the terms of a CMA, that the matter is referred to the Planning and Environment Court or another court or tribunal of competent jurisdiction.
Require the Zig Zag Road to be mapped to reflect its legal status as a local government road. This includes a 50m buffer from the centre line of the road that extends to both sides of the road and rezoned to be wholly incorporated into zone C.	Agreed	Please note that Zig Zag Road has not previously had a zone C buffer. The buffer in that location was generated by the now-decommissioned powerline. Zig Zag Road is a formed, gazetted local government road that is currently being maintained by the local government. A zone C buffer is proposed for this road.
The Authority undertake a thorough analysis of all gazetted and formatted roads in the area to reflect their legal status and ensure the ongoing potential development of the pink zone. For example, the 10-Mile and Bulbin Roads which are gazetted should be map within buffer in line the Zig Zag Road.	Agreed	The Authority has undertaken an audit of formed, local government roads maintained by local government. As a result, a zone C buffer has been applied to 10-mile Road, Bulbin Road and Zig Zag Road. Other roads not reflected on the zoning maps that existed before the Wet Tropics Management Plan 1998 came into effect are considered lawful access roads under the Management Plan.
Amend the draft Management Plan to give statutory effect to the draft Strategic Plan. This includes the incorporation of outcomes and strategies to give effect to any future plans (master pans and CDPs) and guidelines.	No change	This request is contrary to the reason for which the Strategic Plan was made, that is, to capture matters that could not be written into the amended Management Plan. Some of the intentions embedded in the request have been facilitated through proposed changes to the CMA provisions of the Management Plan and the statutory guideline discussed above.

Support Native Title Representative Body (NTRB) submission regarding United Nations Declaration on the Rights of Indigenous Peoples and the need for Full Prior and Informed Consent (FPIC) in relation to the plan review process.	No change	This issue has been resolved with the NTRB. The NTRB has indicated that an acceptable FPIC process has been followed with Rainforest Aboriginal Peoples for the purpose of reviewing the Management Plan.
Submission 41		
Pleased to note that the changes around improved zoning system to the plan provide greater opportunity for appropriate future visitor infrastructure in all zones.	Noted	No further comment.
Note that only zone C permits allows developed visitor infrastructure and understand that aspirations in other zones are to be negotiated through the Master Plan and CMA process.	Noted	The Authority will continue to work with collaboratively on the Masterplan and CMA process.
Reducing impacts of community services infrastructure—we believe there needs to be an annual assessment review requirement for all approved permits. A review clause appears to be missing in the Plan. A review will ensure that permit holders are upholding the requirements of their permits.	No change	The Authority will support further discussions with the registered native title bodies corporate (RNTBC) and infrastructure providers regarding review of permit requirements. This does not require an amendment to the Management Plan and can be achieved through administration of permits.
We understand that any road development of access tracks in the Trustee Area will be negotiated as part of the Master Plan project and endorsed by the CMA and Town Planning Scheme.	Noted	Normally roads can only be constructed in zone C. An agreed CMA will override the zoning in the Trustee area to the extent defined in the agreement and may allow for roads to be built to support the Master Plan project.
Recognising Aboriginal tradition—we note and appreciate the Authority's commitment that the proposed amendments meet the requirements of the <i>Native Title Act 1993</i> (Cth) ('the NTA') and uphold the native title rights. None of the	Noted	No further comment.

proposed changes affect native title rights prescribed under the NTA 1993 (Cth) s.211 and thus a permit is not required to exercise these native title rights.		
The RNTBCs and native title holders have made their ambitions clear to preserve country in a culturally environmentally way that create community development activities that are mutually beneficial, and protect, conserve, rehabilitate, present and transmit to future generations of the World Heritage Area. We believe the Master Plan CMA and Community Development Plan will enable us to achieve our aspirations for our country and the World Heritage plan requirements.	Agreed	The Authority supports the RNTBCs Master Plan approach and consideration of community development aspirations which balance the protection, conservation, rehabilitation and presentation of the Area.
We are concerned that the requirement of cultural and environmental values are not being met on existing 99yr leases inside the Trustee area. Hence why the RTNBC is undertaking a Masterplan in collaboration with WTMA and local government to ensure that all domestic activities are undertaken in accordance with WTMA Management Plan and Town Planning Scheme.	Noted	The Authority is committed to working with the RNTBC to ensure that the lease holders are aware of their obligations under the Wet Tropics World Heritage Management and Protection Act 1993 and the Wet Tropics Management Plan 1998. The Authority thanks the RNTBC and native title holders for their collaborative planning approach.
Request additional changes to support CMAs CMAs to include statutory guidelines including principles against which a CMA may be assessed ability to amend a CMA dispute resolution options.	Agreed	The Authority supports the recommendation to develop statutory CMA guidelines. Note: The CMA guideline cannot be finalised until the Management Plan amendments take effect because the current plan does not contain the relevant head of power. The new CMA Guidelines are being developed with Rainforest Aboriginal Peoples, and changes to the Management Plan will clarify: • principles against which a CMA will be assessed

		 relationship between subdivision and CMAs ability to amend a CMA agreement dispute resolution process relevant court for appeals.
Regulation of domestic activities—the Master Plan will identify all future residential areas and these areas will be zoned in consultation with the Authority and negotiated by way of CMA. The Master Plan and CMA will also underpin an Indigenous Land Use Agreement that will outline and regulate domestic activities.	Noted	No further comment.
Understand that the CMA for the Master Plan will negate the need to apply for individual permit approvals from the Authority and the CMA will deal with the preservation of world heritage and cultural and environmental values.	Agreed	The Authority is committed to working with the RNTBC to ensure that the Master Plan and CMA negate the need for individual permits from the Authority. However, where the impacts of a proposed activity (e.g. sighting, design, road access) cannot be determined or assessed at the time of finalising the CMA, a permit assessment process may be required at a later date to manage impacts. The CMA will describe this process.
Undesirable plants and animals—support the list of undesirable plants and animals in the Area; and create conditions for the keeping of dogs, cats, honeybees.	Noted	No further comment.
Subdivision—we understand the Master Plan, CMA and Town Planning Scheme will finalise and address impacts on the Area.	Agreed	The Authority supports the Master Plan as the preferred mechanisms for considering aspirations for subdivision.
Other issues considered—it is essential that government authorities take steps to ensure the local government is fully aware of the zoning and planned development requirements for the Area by referencing the zones within the relevant Planning Scheme.	Agreed	The Authority will continue to inform state government agencies and local governments of the implication of the Management Plan and CMAs.

Offsets—the RNTBC is interested in claiming environmental offsets under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) and appreciates clarification on how to achieve this outcome.	Noted	The Authority will support the RNTBC to explore this outcome.
Mining—do not support mining within the Trustee Area and supports the Authority to seek amendments to the Wet Tropics World Heritage Protection and Management Act 1993 to prohibit mining in the World Heritage Area following the conclusion of the Plan Review.	Noted	The Authority thanks the RNTBC for their support.
Submission 42		
Improved zoning system—we have aspirations to create limited visitor infrastructure, such as walking tracks, cycling tracks, small-scale toilet facilities, visitor shelters and/or recreational camping areas within our native title determination area.	Noted	No further comment.
Enabling appropriate visitor infrastructure—pleased to note that the changes to the plan provide greater opportunity for appropriate future visitor infrastructure in all zones.	Noted	No further comment.
Note only zone C permits developed visitor infrastructure. Understand that aspirations in other zones are to be negotiated through the Master Plan and CMA process. It is the RNTBCs intention to develop a CMA with the Authority that covers these activities and promotes socio-	Noted	The Authority supports the RNTBCs intent to negotiate a CMA to accommodate its aspirations. Note: where the underlying land tenue is national park, Queensland Parks and Wildlife Services will need to be party to a CMA agreement.

title holders and surrounding		
area. Reducing impacts of community services infrastructure—believe there needs to be an annual assessment review requirement for all approved permits. A review clause appears to be missing in the Plan.	No change	The Authority will support further discussions with the RNTBC and infrastructure providers regarding review of permit requirements. This does not require an amendment to the Management Plan and can be achieved through administration of permits.
Roads—we understand that any road development or access tracks in the native title determination area will be negotiated with the Authority as part of the CMA negotiations.	Noted	The Authority supports the RNTBCs intent to negotiate a CMA to accommodate its aspirations.
Recognising Aboriginal tradition—we note and appreciate the Authority's commitment that the Proposed Amendments meet the requirements of the Native Title Act 1993 (Cth) and uphold native title rights in particular: None of the proposed changes affect native title rights prescribed under the Native Title Act 1993 (Cth) s.211 and thus a permit is not required to exercise these native title rights, which include hunting, fishing, gathering and cultural or spiritual activities.	Noted	No further comment.
Request additional changes to support CMAs CMAs to include statutory guidelines including principles against which a CMA may be assessed ability to amend a CMA dispute resolution options.	Agreed	The Authority supports the recommendation to develop statutory CMA guidelines. Note: The CMA guideline cannot be finalised until the Management Plan amendments take effect, because the current plan does not contain the relevant head of power. The new CMA Guidelines are being developed with Rainforest Aboriginal Peoples, and changes to the Management Plan will clarify: principles against which a CMA will be assessed relationship between subdivision and CMAs

		 ability to amend a CMA agreement dispute resolution process relevant court for appeals.
Regulation of domestic activities—intend to engage with the Authority to develop a CMA for the native title determined area.	Noted	The Authority supports the RNTBCs intent to negotiate a CMA to accommodate its aspirations.
Undesirable plants and animals—support the list of undesirable plans and animals in the Area; and create conditions for the keeping of dogs, cats and honey bees.	Noted	No further comment.
Offsets—the RNTBC is interested in claiming environmental offsets under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) and appreciates clarification on how to achieve this outcome.	Noted	The Authority will support the RNTBC to explore this outcome.
Mining—the RNTBC does not support mining within the native title determination area and supports the Authority to seek amendments to the Wet Topics World Heritage Protection and Management Act 1993 to prohibit mining in World Heritage Areas following the conclusion of the Plan Review.	Noted	The Authority thanks the RNTBC for their support.
Subdivision—it is the RNTBCs ambition to develop a CMA for their native title determination area.	Noted	The Authority supports the RNTBCs intent to negotiate a CMA to accommodate its aspirations.
Submission 31		
infrastructure—our people retain current cultural knowledge of our tribal lands and would be grateful to work with the Authority to form strategic partnerships to open these ancient tracks crisscrossing our region on National Park Estates to nature tourism opportunities. There are various rock	Noted	The Authority welcomes further collaboration with the Buluwandji People regarding cultural tourism and cultural walking tracks. If these tracks are within National Parks land, Queensland Parks and Wildlife Service will also have to be involved in the discussion. Note: construction of walking tracks may be allowed under a permit in any zone.

shelters, campsites and ancient rock art galleries to		
engage in cultural tourism in		
parallel.		
Other issues considered	Noted	No further comment.
Strategic Plan—two of the five		
strategies are in essence		
complementary: supporting		
Rainforest Aboriginal Peoples		
(Bama) integrated with world-		
class tourism and recreation.	Nistad	A
Strategy 2 (Action 2.3 and	Noted	A rainforest tax has not been considered as
2.4)—we support a 'Rainforest tax' similar to the		part of the consultation on the Management Plan review. However, the Authority is active
'Reef tax' for tourism use of		in trying to bring more investment into the
Wet Tropics National Park		Wet Tropics to support Traditional land
Estates to fund permanent		management, including through Indigenous
ranger positions at an agreed		ranger programs. This will continue to be a
number of positions per		focus for the Authority.
hectare of jointly managed		
protected areas on tribal		
lands.		
Assist us to support	Noted	As part of the Strategic Plan the Authority has
accreditation for Wet Tropics		committed to continue to deliver the Wet
Tour Guide cadet programs		Tropics Tour Guide Program to further develop
through our local high schools		tour guide confidence and competence to
to engage young people with		provide access to up-to-date, high standard
the vision, pride and positions		and culturally appropriate information.
to work on country. Strategy 4 (Action 4.2 and	Noted	The Authority welcomes further collaboration
4.4)—epic trails are on the	Hoteu	regarding cultural tourism and cultural walking
rise as international tourist		tracks. If these tracks are within National Parks
attractions. On Buluwai tribal		land, Queensland Parks and Wildlife Service
lands we would like to		will also need to be involved in the discussion.
develop the Kuranda—Davies		
Creek—Tinaroo Historic Bama		
Trail (approximately 45km		
through National Park Estates		
on Buluwai tribal lands,		
Wangetti Trail is 76km).		
Submission 44		
An improved zoning system—	Agreed	The Authority can clarify beyond doubt that
concerned that by placing a		the changes made to the zoning maps do not
zone A blanket over the entire		narrow Traditional Owners ability to return to
lease the Authority is again		country, and will not impact upon existing
reducing Traditional Owner's		CMAs. The following proposed amendments to
capacity to return to country.		the Management Plan help to clarify this:
Feels very strongly that the		s.43 has been clarified to state that the Management Plan energies subject to
Feels very strongly that the pink zones within the lease		Management Plan operates subject to CMAs
area, which are recognised in		CIVIAS
area, willen are recognised ill		

the Indigenous Land Use Agreement (ILUA), and are currently zoned B should not be rezoned to zone A as proposed.		 s.43Cstates that CMAs prevail over the zoning maps to the extent of an inconsistency. Regarding proposed zoning changes within the lease area, the Authority has agreed to retaining the 1998 zoning under the current Management Plan for the lease area.
Disagree with the statement that the area moving from zone B to A has recovered and that this gives visitors the wrong impressions regarding 'pristine' condition.	Interpretation issue	The interpretation that the zoning gives the wrong impression regarding the integrity of the land is incorrect. The Authority's intent for the proposed amendments to the management purpose of the zones is to describe the management purpose, not the existing integrity or condition of any particular area of land. The Authority recognises the use of the lease area and commitment of the leaseholder to preserving the integrity of the Area. The Authority reiterates that CMAs prevail over the 'underlying' zoning. The activities agreed through a CMA can be communicated with visitors to the Area so that they have the correct understanding.
The Authority clearly states, the rezoning will not affect the current CMAs and CDPs, why then is it necessary to place a zone A blanket over all of the lease area?	Interpretation issue	The Authority's intent in rezoning much of the land in the Area is to recognise that much of the Area has recovered from the disturbance of historical land uses. However, the Authority acknowledges that there are existing uses which predate the Management Plan, and are recognised under the existing CMA. The Authority also acknowledges that the CMA anticipates further community development activities. See response to 'improved zoning system' above.
Domestic activities—the Authority's proposal to expand these activities to allow for the installation of electricity, water supply and communications for domestic purposes (with a permit) is welcomed.	Noted	No further comment.
Proposed rezoning to zone A will negatively impact on Traditional Owners ability to	Interpretation issue	The interpretation that the proposed amendments to zoning will prohibit permits for domestic activities in zone A is incorrect.

	I	
undertake future domestic		The Authority has maintained the intent of the
activities and clearly no		The Authority has maintained the intent of the
opportunity at all for		original Management Plan. A permit may be
commercial enterprises other		issued to a landholder or a native title holder
than eco-tourism.		to undertake a domestic activity in any zone.
		Rezoning to zone C is not required.
		However as stated, a CMA is the most
		appropriate tool to consider other community
		development activities. The Authority will
		continue discussions with the leaseholder
		about their aspirations on country.
Recognising Aboriginal	Agreed	The Authority acknowledges that return to
tradition and CMA—the		country aspirations are broader than
Authority repeatedly states		protection and exercising native title rights.
that the proposed rezoning		
and new definitions of the		The Authority is committed to working with
zones will have no impact on		Traditional Owners across the Wet Tropics to
Native Title rights as		reach agreement through CMAs or other
prescribed under s.211 of the		agreements, to accommodate traditional
Commonwealth <i>Native Title</i>		owner aspirations to live and work on Country.
Act 1993. However, native		The Wet Tropics Strategic Plan 2020–2030 also
title rights as agreed to by all		details a number of actions to support return
parties, is clearly different		to country aspirations under Strategy 2:
from the aspirations of		support Rainforest Aboriginal Peoples.
Traditional Owners wanting to		
return to country to live and		
work.	_	
Roads—the proposed road	Agreed	The Authority has undertaken an audit of
classifications will see three		formed, local government roads maintained by
major roads removed from		local government. As a result a zone C buffer
the Authority's mapping. The		has been applied to 10-mile Road, Bulbin Road
roads are well used by local		and the Zig Zag Road.
residents for access and by		
visitors for recreation		
including hiking, biking and		
four-wheel drive touring and		
should be included on the		
Authority's zoning maps.		
Request:		
· ·		
Zig Zag Road and 10-Mile		
Roads reclassified as local		
government roads		
Bulbun Road as a		
presentation road and		
managed by land-holders		
Subdivision—concerned that	Interpretation	The interpretation that reconfiguring a lot
once the new zones are in	issue	would not be allowed in zone A is incorrect.
place, it will be difficult to		
place, it will be difficult to	I and the second	
•		
have an application approved to reconfigure an allotment		

for future domestic and community activities as the area will now be classified as zone A and having high integrity values.		The Authority's intention is that a permit may be issued to reconfigure an allotment in any zone. The Authority's preferred approach to reconfiguring a lot and community development aspirations more broadly is to adopt an Aboriginal led planning process to arrive at a CMA. This process would support full consideration of future community development aspirations and balance the protection, conservation, rehabilitation and presentation of the Wet Tropics of Queensland World Heritage Area.
Recognising Aboriginal Tradition—acknowledge the efforts that the Authority has made to consult with Rainforest Aboriginal Peoples regarding the review and proposed amendments to the Management Plan.	Noted	No further comment.
Request for an Indigenous Land Use Agreement to demonstrate free, prior and informed consent to the proposed amendments to the Management Plan.	No change	The Authority has resolved this matter with the submitter. The submitter is no longer of the view that an ILUA is required. The Authority reiterates that the review process has been strongly compliant with Article 19 of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).
Concerned that the draft s.62 Permitting Guidelines are not currently adequate. Extend an offer to collaborate further in the development of guidelines particularly relating to Free Prior and Informed Consent.	Agreed	The Authority has commenced consultation in good faith with Rainforest Aboriginal Peoples and interested organisations regarding the draft s.62 Guideline for consulting with Rainforest Aboriginal Peoples particularly concerned with the land in the Area. The Authority welcomes the offer to work with the Authority to achieve best practice Free Prior and Informed Consent (FPIC) procedures that satisfy the UNDRIP and World Heritage management principles.
Submission 47 Traditional Owners would like	Noted	The Authority supports the aspirations of
to explore native bee honey production (beekeeping) within the Wet Tropics World Heritage Areas including National Parks, Native Title Lands and State Forests.		Traditional Owners as they relate to native bee honey production. The proposed amendments will not inhibit the keeping of native bees. Permission may be required from the landholder.

We agree with the proposed amendments in regard to the regulations of European bees within the Wet Tropics World Heritage Area.		
Submission 24		
Recognising Aboriginal tradition (Recommendation 2)—prepare statutory guidelines for the creation of cooperative management agreements (CMA), Community Development Plans (CDP) and Activity Guidelines (AG).	Agreed	The Authority supports the recommendation to develop statutory CMA guidelines. Note: The CMA guideline cannot be finalised until the Management Plan amendments take effect, because the current Management Plan does not contain the relevant head of power. The new CMA Guidelines are being developed with Rainforest Aboriginal Peoples, and changes to the Management Plan will clarify: principles against which a CMA will be assessed relationship between subdivision and CMAs ability to amend a CMA agreement dispute resolution process. Relevant court for appeals. The guideline will not confine CMAs to specific process or format. It will at the request of the Rainforest Aboriginal Peoples and Native Title Representative Bodies include a nonmandatory template. The non-mandatory template will include definitions for CDP and AG.
Recommendation 3—the draft Management Plan be amended to include a process to vary a CMA, CDP and AG with a robust mechanism that permits an applicant to appeal a decision made by the Authority regarding the approval conditions or refusal.	Agreed	As is the current arrangement, these provisions are included in the CMA, this enables both parties to agree to the terms rather than be dictated to by the Management Plan. Appeal rights already exist for permit decisions.
Recommendation 4—create an Appeal Schedule within the draft Management Plan to hear matters regarding CMA's, CDP's, AG or any decision making/assessment outcome related to a refusal	No change	A CMA is a negotiated agreement between the Authority and other parties. The entering into the agreement is completely voluntary. The Authority has agreed to developing statutory guidelines which will give greater clarity on the CMA process upfront.

or conditions attached to a decision.		
Regulation of domestic activities (Recommendation 5)—consider the draft Management Plan be tightened to ensure that linkages between s.33(q) (reconfiguring a lot) and s.63 (domestic activities) of the draft Management Plan and the CDPs are made clear and transparent. Note: s.33(r) in consultation v23 is s.33(q) in the final v39.	Agreed	The Authority supports the recommendation to clarify the relationship between reconfiguring a lot and CMAs and appropriate linkages have been considered in the proposed amendments.
Other issues considered (Recommendation 1)—amend the draft Management Plan to create statutory recognition of the draft strategic Plan. Alternatively, align the outcomes and strategies contained within the Strategic Plan and the draft Management Plan. We encourage the Authority to consider making the	No change	The Strategic Plan was developed to capture issues raised by the Wet Tropics community that could not be addressed by amendments to the Management Plan. The Strategic Plan strategies and actions align with the primary goal—the protection, conservation, rehabilitation presentation and transmission to future generations of the World Heritage Area. The Strategic Plan informs the annual work plans of the Authority and communicates
necessary changes to strengthen the relationship between its planning instruments, statutes and processes to achieve transparent and accountable decision making.		organisation priorities and strategies.

4. Submissions from the Conservation Sector

Submission 49		
Submission	Authority's position	Authority's response
Improved zoning system (Recommendation 1)— Reinstate the intended physical and social settings sections into zone definitions as they provide context to what can be expected if the	No change	'Intended physical and social settings' was replaced with 'management purpose' to strengthen protection of World Heritage values and integrity in each zone. This reduces ambiguity about how the land must be managed. It changes the emphasis of zone management from managing the land based on its perceived or current integrity, to

management intent is managing the land for the protection of World achieved. Heritage Values and integrity. This change corrects the inconsistencies in the current Management Plan. For example, there are many areas of current and proposed zone A that do not conform with the current physical and social setting, such as having an obvious management presence (e.g. management roads, walking trails, car parks and viewing platforms). These amendments remove the ambiguity, leaving the management purpose as the only relevant consideration for that zone. Recommendation 2—keep No change The Authority understands that the the area currently known as conservation sector are concerned that the zone A as it is, with its change of the management purpose of each zone and clarification of the type of visitor existing definition and restrictions on infrastructure allowed in all zones is a development. If necessary weakening of protection for land in zone A. change definition to reflect The Authority's intent is to strengthen the level intent, rather than of protection for zone A under the new condition, but do not Management Plan. change intent and ensure The amendments to the Management Plan do intent is to manage to not allow any additional development in zone highest level of condition, not 'mostly' of high quality. A that is not already allowed under the current plan. The word 'mostly' may have been misinterpreted. 'Mostly' refers to the fact that all land in zone A will be managed to 'protect and conserve the integrity of land in the zone', even if parts of the land are not currently of high integrity (i.e. still recovering from disturbance). The Authority has proposed to amend this wording to remove any confusion. Recommendation 3— No change The purpose of zones in the amended assess zone B and move Management Plan is to describe the restored areas into zone A. management purpose, not the existing We know this is a big ask integrity or condition of any particular area of but if we can't say with land. confidence what areas are of what condition, how are Zones are not a monitoring tool. Measuring we able to demonstrate we values is best done through other approaches such as Biodiversity and Assessment Mapping are maintaining and improving the values for Method (BAMM), and reported through which the Area is World mechanisms such as annual State of the Wet

Tropics Reports and Outlook (IUCN) reports

etc.

Heritage listed? The plan

needs to be explicit that the

goal is to manage the Area		
of the highest standard. Recommendation 4— collapsing zone D into C increases the area where "developed visitor infrastructure" is permitted from 254ha to 12,353ha. This was to provide the tourism industry with flexibility. This goes way beyond providing flexibility. If the zone D sites were not suitable, as has been claimed, rather than the proposed collapse of zone D into C, it should have been incumbent on the tourism industry to identify suitable areas – say, for example, up to 500ha, with a provision that only 50% be subject to development. The proposed areas then need to be put to other stakeholders, including conservation, prior to being legislated. This is, in effect, reinstating zone D whilst providing flexibility.	No change	It is already possible to apply for a permit under the existing Management Plan to construct 'visitor facilities' in zone C (see: zone C management purpose). Allowing consideration of 'developed visitor infrastructure' (and defining what this means), clarifies the types of infrastructure that may be considered. The intent of collapsing zones D and C together is not to increase the amount of tourism infrastructure, but to provide opportunity for tourism in the most appropriate places to present the Area. Consideration of any proposals for 'developed visitor infrastructure' in zone C would be subject to the principles and criteria for deciding permit applications. However, in response to submissions the Authority has further clarified the management purpose for zone C in new s.12(2)as follows: 'Another management purpose of zone C is to ensure, so far as is reasonably practicable, that any visitor infrastructure on land in the zone is built and maintained in a way that— (a) is ecologically sustainable; and (b) is sensitively integrated into the surrounding landscape; and (c) increases visitors' understanding and appreciation of the natural and cultural heritage of the Area.'
		The Authority agrees that further stakeholder discussion and guidance is required to better define appropriate tourism in the WHA, such as a strategic assessment plan for tourism.
Enabling appropriate visitor infrastructure (Recommendation 5)— prior to any new 'visitor infrastructure', develop a strategic assessment and plan for tourism, with the primary goal of improving presentation and transmission. In addition to	Agreed	The Authority has secured funding under the Heritage Grants program to develop a key component of a strategic assessment and plan for tourism— this will take the form of a future 'Wet Tropics Tourism and Destination Plan'. This plan will be developed over the next 12 months with the full participation of the conservation and tourism sectors and Rainforest Aboriginal Peoples.

including conservation and Rainforest Aboriginal Peoples in developing these, the final plan needs to first be put to other stakeholders and then to the public for endorsement. This process needs to be laid out in the statutory management plan.		The intent is to undertake full public consultation, and to make the plan publicly available. In the interim, any proposals will be subject to the principles and criteria for deciding permit applications.
Recommendation 6—no exclusive access provided to any tourism operation.	No change	The Management Plan regulates a wide range of set of activities under Division 3 and 4. However, there are no powers within the Management Plan that would allow the Authority to specifically grant access, exclusive or otherwise, to any tourism operation. Commercial tourism in National Parks is regulated under the Nature Conservation Act 1992.
Recommendation 7— remove nature-based tourist park and nature- based tourism accommodation from definition of 'developed visitor infrastructure'. No definitions have been provided, let alone a case put forward as to why these are necessary to meet our presentation obligations.	Agreed	The Authority has removed the examples of 'nature-based tourist park' and 'nature-based tourist accommodation from the definition of developed visitor infrastructure. In response to submissions the Authority has further clarified the scope of developed visitor infrastructure under the management purpose of zone C. Developed visitor infrastructure must be developed and managed to be ecologically sustainable, sensitively integrated into the surrounding landscape, and to increase visitor appreciation and understanding of natural and cultural heritage.
Recommendation 8— prohibit any commercial leasing in zones A, B and C. Commercial leasing is not appropriate, we need the ability to limit or shut down operations should they be found to cause unforeseen impacts on the World Heritage values or integrity of the Area.	No change	The Management Plan does not have specific provisions to regulate commercial leasing. Queensland Parks and Wildlife Service regulates commercial activity and leasing under the Nature Conservation Act 1992. If an activity is assessed to have impacts on WHV and integrity, the Authority has powers to refuse a permit or include conditions on a permit.
Recommendation 9—any commercial developments should require adequate financial assurance or	Agreed	Queensland Parks and Wildlife Service regulates commercial activity and leasing

rehabilitation bonds and not just to remove infrastructure but to rehabilitate the site and any areas affected by the increased visitation the operation facilitated.		 under the Nature Conservation Act 1992, including financial assurance. However, for any activity for which the Authority can issue a permit, the Authority has powers to: include conditions on a permit, that includes ability to request a security or performance bond for compliance with the permit (see s.52 (i) and (ii) in existing Management Plan) further penalty units apply if the permit holder breaches permit conditions.
		These powers remain unchanged in the
		proposed amendments.
Recommendation 10— need to identify how additional resourcing will be secured to manage the impact of increased visitation, not just servicing of visitor infrastructure.	Agreed	When considering issuing a permit, the Authority will consider the precautionary principle and cumulative impact of a proposed development, and may either refuse to issue a permit or set conditions on the permit. The proposed Wet Tropics Tourism and Destination Plan will assess visitor management as part of its consultation process.
Recommendation 12—	No change	Any application to open a new cycle path
remove cycle paths from		would be subject to the principles and criteria
definition of 'limited visitor		for deciding permit applications.
infrastructure'. Habitat loss		
and fragmentation is		A proposal for a cycle path would not be
historically the largest		approved if it would lead to impacts such as
threat to the Area. Cycle		habitat loss and fragmentation, consistent with
paths have a significant potential to increase		the principles and criteria for deciding permit applications.
fragmentation and other impacts associated with linear developments such as spread of weeds and invasive species.		If approved, permits would include appropriate conditions for the land manager, such as measures to ensure weed hygiene (e.g. a wash down facility).
Roads (Recommendation	Agreed	Any application to open a new road would be
11)—no opening of old or		subject to the approval of the relevant land
new roads without		manager and a permit assessment process. The
extensive consultation. A		permit assessment process includes
more broadly conservation		community considerations, and the Authority
sector needs to be given		would direct the applicant to consult all
standing in Strategy 4 of		relevant parties.
the Strategic Plan.		
		The Authority has incorporated increased standing of the conservation sector under Strategy 4.

Recommendation 13— opening of roads, cycle paths, nature-based tourist park and nature-based accommodation, if not prohibited, need to be subject to public notice, comment and appeals.	Noted	Any application for these types of infrastructure would be subject to the principles and criteria for deciding permit applications, including community considerations. The Authority would direct the applicant to consult relevant parties.
Recommendation 14— community services infrastructure needs to be limited to essential for the local community, not for tourism development. Extending power lines will further exacerbate habitat fragmentation and should be prohibited.	Agreed	Community service infrastructure is defined in the Management Plan. In considering any proposal for developed visitor infrastructure, the Authority would also assess any associated infrastructure, such as powerlines, within the same permit consideration. For example, if a tourism development could be approved under permit, but the associated infrastructure could not, the Authority may require the applicant to propose a prudent and feasible alternative (i.e. on-site electricity generation rather than powerlines).
Offsets (Recommendation 15)—both the state and Commonwealth Frameworks are not adequate. Additional measures are required for the World Heritage Area and need to be included in the plan. Offsets should be for unavoidable residual impacts. There is a big difference between essential community services and tourism development. Tourism development is not essential. Residual impacts of tourism development are always avoidable if the development does not occur. To accept residual impacts of tourism is trading the value of tourism for an incremental loss of OUV. The Wet Tropics is	No change	offsets are applied where there is a significant residual impact on the environment or ecosystem. In all cases the Authority manages development to avoid significant impact on the World Heritage values and on the Area's integrity. The Authority has maintained the capacity to apply particular conditions on permits that can prevent or minimise any adverse impacts. The Authority is proposing to strengthen this by including a provision that will enable conditions on permits that will contribute to achieving the primary goal, including, for example, by carrying out the proposed activity in association with another activity (an associated activity). Regarding visitor infrastructure, the Wet Tropics World Heritage Area is an exceptional landscape. It warrants concerted efforts to provide the highest quality standards in presentation, including a diversity of experiences to allow residents and visitors to enjoy and appreciate the values of the Area. Of course, this needs to be balanced with ensuring that there are no negative impacts on the OUV of the Area.

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irreplaceable area on earth,		
we cannot afford to trade		
biodiversity and the		
integrity of the Area in		
exchange for visitors.		
Recommendation 16—	No change	This is not a plan review matter but will be
reinstate the conservation		considered as part of ongoing dialogue with
sector Liaison Group		the conservation sector.
(CSLG). Whether the		the conservation section
perceived loss of protection		The CCC provides a mechanism for regular
is real or not, it is clear that		consultation across the community, including
there has not been		the conservation sector.
adequate input from the		
conservation sector in		
developing the Plan Review		
consultation documents.		
Since moving to the		
Community Consultative		
Committee (CCC), the		
sector has had no formal		
ways in which to contribute		
their vast knowledge to		
guide and support the		
Authority in protecting the		
OUV of the Wet Tropics		
World Heritage Area.		
Appointing two		
conservation		
representatives to the CCC,		
who have no formal		
obligations (or means) to		
represent or report back to		
the broader sector, is not		
proving to be an adequate		
substitute for the CSLG.		
Submission 20		
Improved zoning system—	Noted	No further comment.
welcome the		
reclassification of zone B		
land to zone A which was to		
result in 93% of the Wet		
Tropics World Heritage		
Area being manage		
primarily for conservation		
and rehabilitation.		
It appears that the way	Interpretation	The interpretation that the changes to zones
land in the World Heritage	issue	will reduce the conservation purpose of each
Area is classified into zones		zone is incorrect.
no longer relates to the		
environmental value of the		The Authority's intent for the proposed zoning
land, but the intended		amendments is to strengthen the protection of

use/access of the land presently or in the future. This is a step away from a conservation purpose to a land use purpose.

values for which the Area is listed. We believe we have achieved this intent through:

- increasing the area of land that affords the highest level of protection (zone A increased from 52% to 93%)
- strengthening the level of scrutiny of new infrastructure proposals
- strengthening the assessment for all proposed development in the Area through the use of the terms 'world heritage values (WHV) and integrity', rather than just OUV. We have looked carefully at the fundamental principles against which decisions are made under the Management Plan. The test using WHV and integrity is stronger than reference to OUV.

Note: that no additional development is allowed in zone A and B under the amendments to the Management Plan which is not already allowed under the existing plan.

The level of protection for zone A will be strengthened under the new Management Plan.

The Authority understands that the conservation sector are concerned that the change of the management purpose of each zone and clarification of the type of visitor infrastructure allowed in all zones is a weakening of protection for land in zone A. The Authority's Intent is to strengthen the level of protection for zone A under the new Management Plan.

The amendments to the Management Plan do not allow any additional development in zone A that is not already allowed under the current Plan.

The word 'mostly' may have been misinterpreted. 'Mostly' refers to the fact that all land in zone A will be managed to 'protect and conserve the integrity of land in the zone', even if parts of the land are not currently of high integrity (i.e. still recovering from disturbance). The Authority has proposed to amend this wording to remove any confusion.

Do not support the changes to the purpose of zone A in the draft amended Plan, from protecting the integrity and restoring the land to a 'natural state' to protecting integrity and restoring the land to an 'extent reasonably practicable' while enabling visitor access and enjoyment.

This can be interpreted as a 'lowering of the bar' and a reduction in the overall conservation aim of the zone.

No change

The management purpose of zone B has been expanded to include 'enable visitors' access to appreciate and enjoy the area'. This change eliminates the identification of an area that is in a degraded state and which future rehabilitation management and protections should be considered and applied.	Interpretation issue	The interpretation that the changes to the management purpose of zone B remove the Authority's requirement to actively rehabilitate and protect degraded areas is incorrect. The Authority's intent in the proposed amendments is to describe the management purpose, not the existing integrity or condition of any particular area of land. The management purpose of all zones now includes protecting and conserving the integrity of the land in the zone. If the land in the zone is disturbed to restore the integrity of the land.
The proposed purpose of zone C is clear.	Noted	No further comment.
Enabling appropriate visitor infrastructure—support visitor access and enjoyment of the World Heritage Area but it cannot be at the expense of its integrity and values.	Noted	No further comment.
The examples of limited visitor infrastructure are ambiguous, with not clear indication of the capacity of 'small-scale'. The lack of certainty written into the draft amended Plan makes it impossible for us to comment on what the scale, size or footprint that the limited visitor infrastructure will have on the Wet Tropics World Heritage Area.	No change	The amended Management Plan does not allow any additional development in zone A that is not already allowed under the current plan. Any application to undertake an activity will be assessed on a case by case basis against the principles and criteria for deciding an application. However, in response to submissions, the Authority has provided greater clarity regarding cumulative impact in the permit assessment process in subsequent versions of the proposed amendments.
'Nature-based tourism' is a very broad definition, and thus it is unclear what activities and facilities fall within the scope of 'nature-based tourist accommodation and parks'. Without a detailed understanding of the size and scope of visitor infrastructure, the	Agreed	The terms have been removed from the definition of developed visitor infrastructure. The Authority has removed the examples of 'nature-based tourist park' and 'nature-based tourist accommodation from the definition of developed visitor infrastructure. In response to submissions the Authority has further clarified the scope of developed visitor

appropriateness of such infrastructure in World Heritage Area cannot be determined.		infrastructure under the management purpose of zone C. Developed visitor infrastructure must be developed and managed to be ecologically sustainable, sensitively integrated into the surrounding landscape, and to increase visitor appreciation and understanding of natural and cultural heritage.
Alternatively, if the Authority has a limited visitor infrastructure proposal for the next five to ten years then it would be transparent and consultative to provide this to stakeholders within the review phase. Additionally, we recommend that should the Authority not have this proposal then we are of the view this should be done as a matter of urgency and open to public consultation.	Agreed	The Authority has secured funding under the Heritage Grants program to develop a key component of a strategic assessment and plan for tourism— this will take the form of a future 'Wet Tropics Tourism and Destination Plan'. This plan will be developed over the next 12 months with the full participation of the conservation and tourism sectors and Rainforest Aboriginal Peoples. The intent is to undertake full public consultation, and to make the Management Plan publicly available. In the interim, any proposals will be subject to the principles and criteria for deciding permit applications.
Community service infrastructure—concern over possible incremental loss of zone A and B land through the state and local government applications to rezone land from B to C. If land is rezoned from B to C, will land from zone A also be rezoned into B to allow a 50-500m buffer for the new zone C land? Further, can the new zone B buffer also be subject to a rezoning application? The answer to these questions appears to be yes in the draft amended Management Plan and Strategic Plan.	No change	The opportunity to rezone land has not changed under the proposed amendments. The Management Plan continues to support the installation of essential and other community services infrastructure in appropriate locations and where there is not feasible alternative. There is no intention, when a rezoning is undertaken, to undertake a subsequent change to a buffering zone.
Recommend that in addition to public notification and consultation, that submitters to an	No change	The Authority does not support extending appeal rights for submitters to an application for rezoning under Schedule 1 or s.18 'procedure for amending zoning map for a particular purpose'.

application to rezone land from zone B to C be afforded the same review and appeal rights as applicants. Appeal rights should also be extended to the general process for changing zones and maps. Disused roads not identified as planned future presentation roads (in the Strategic plan) should be	Noted	For s.17 as the process for amending a zoning map is set out under the Wet Tropics Act and outside of the scope of the Management Plan review. The proposed amendments clarify that part of the management purpose for all zones is to restore and enhance the integrity of the land.
rehabilitated. Concerned that if the visitor infrastructure and visitor numbers are not capped that more roads will be required for access purposes in zone A and B which contradicts the original intentions of those zones. Suggest Quaid's Road as one road that should not be identified as a future presentation road, and should instead be rehabilitated.	No change	Roads cannot be built under a permit in zone A or B, only in zone C. The Authority has secured funding under the Heritage Grants program to develop a key component of a strategic assessment and plan for tourism—this will take the form as a future 'Wet Tropics Tourism and Destination Plan'. This plan will consider requirements for road access. Quaid's Road is currently identified as a 'management road' and is not intended to be opened for presentation.
Recognising Aboriginal Tradition—the criteria for CMAs between the Authority and Rainforest Aboriginal Peoples must ensure that any activities provide a net gain in the quality and quantity of vegetation, cultural heritage and OUV across the landscape. The recognition of the land's world heritage values in s 41(1A) of the draft amended Plan goes some way to ensuring this. It is important that any guidelines developed for cooperative management agreements are developed	Agreed	The Authority will develop a statutory CMA guideline and make additional changes to s.41 of the Management Plan to better define the principles against which a CMA will be assessed.

on the basis of the world		
on the basis of the world heritage values.		
Domestic activities— support the clarification in the draft amended Plan, giving the Authority discretion to refuse permits for additional residences on land.	Noted	No further comment.
Undesirable plants and animals—the draft amended Plan retains the ability to keep a cat or a dog in compliance with local laws and in a manner that minimises relevant risks. The Authority has the authority to enforce the new s29A under the draft amended Plan. While we recommend that the keeping of cats and dogs be prohibited in the World Heritage Area we are of the view that this is an acceptable compromise.	Noted	No further comment.
Further, we note that from our review of the draft amended Plan it would appear that any person who will be allowed to keep a cat or a dog must only have one or the other no later than four months (the initial period) from when the Plan is amended. We recommend that the land holders to which this amendment will apply be advised of this during the consultation period if they have not already.	Agreed	The Authority can confirm that the intent of the proposed amendments is to allow one cat and one dog each per allotment. The Authority sent formal letters to all landholders inviting submissions during phase 1 and phase 2. The Authority will issue new letters to landholders advising of changes to the Management Plan which may impact landholders on approval of the amended plan.
Adequate resources for enforcement must be allocated to ensure compliance.	Agreed	The proposed amendments include a provision to develop a guideline about the ways a cat or dog may be kept. The Strategic Plan may also support strategic compliance activities with Rainforest Aboriginal Peoples, local government and other relevant organisations.

Mining—there is no prohibition to mining under the draft amended Plan. Support the Authority's intent to remove from the Wet Tropics Act.	Noted	No further comment.
Offsets—concerned that many small-scale activities (such as limited visitor infrastructure and roads) that do not trigger the Commonwealth offsets framework will result in the cumulative decline of the World Heritage Area. We recommend that the Authority implement an offsets policy for small-scale impacts to ensure there is no net loss to the Area. This may be done through imposing conditions under the current permit approval process.	Noted	Offsets are applied where there is a significant residual impact on the environment or ecosystem. In all cases the Authority manages development to avoid significant impact on WHV and on the Area's integrity. The Authority has maintained the capacity to apply particular conditions on permits that can prevent or minimise any adverse impacts. The Authority is proposing to strengthen this by including a provision that will enable conditions on permits that will contribute to achieving the primary goal, including, for example, by carrying out the proposed activity in association with another activity (an associated activity). Regarding visitor infrastructure, the Wet Tropics World Heritage Area is an exceptional landscape. It warrants concerted efforts to provide the highest quality standards in presentation, including a diversity of experiences to allow residents and visitors to enjoy and appreciate the values of the Area. Of course, this needs to be balanced with
Subdivision—support the requirement of a permit to reconfigure a lot in the World Heritage Area.	Noted	No further comment.
Other issue to be considered—recommend that wording for permitted and prohibited activities be amended for both clarity and consistency with other legislation and local laws. Activities that may only be undertaken with a permit should be listed separately under the heading 'prescribed activities'.	No change	The Authority considered this but received advice that such a change would necessitate a significant rewriting of the Management Plan.
Submission 19 Improved zoning system— we have been pleased to note that recovery of the forest has been such that a large percentage can now	Noted	No further comment.

be considered to be in good condition and can be included in zone A.		
It has been disappointing to note that in zone A, there is a proposed expansion of intrusive uses into this high value area. In the earlier plan, this was to be an area of high integrity, remote from disturbance and open to low intensity use with no obvious management presence. The new plan refers to zone A as being mostly of high integrity but may include limited visitor infrastructure.	Interpretation issue	See response to submission 49 under recommendation 1 and 2.
Zone A to retain the same purpose and use as defined in original plan.	No change	The Authority understands that the conservation sector are concerned that the change of the management purpose of each zone and clarification of the type of visitor infrastructure allowed in all zones is a weakening of protection for land in zone A. The Authority's Intent is to strengthen the level of protection for zone A under the new Management Plan. The amendments to the Management Plan do not allow any additional development in zone A that is not already allowed under the current plan.
		The word 'mostly' may have been misinterpreted. 'Mostly' refers to the fact that all land in zone A will be managed to 'protect and conserve the integrity of land in the zone', even if parts of the land are not currently of high integrity (i.e. still recovering from disturbance). The Authority has proposed to amend this wording to remove any confusion.
Zone B to allow limited visitor infrastructure (i.e. walking tracks, track signs, possibly toilets and limited camp sites) where appropriate.	Noted	Zone B now forms a buffer between linear community service infrastructure and zone A. Zone B includes provisions to consider rezoning applications from local government and state agencies for essential community service infrastructure.
Zone C to contain, as at present, community infrastructure, roads,	Noted	No further comment.

a accounting a construction of		
powerlines, water supply, etc as well as any major		
information and		
interpretive infrastructure.		
Enabling appropriate visitor infrastructure—the lack of a definition of 'limited tourist infrastructure' is concerning and open to interpretation, especially in light of 'ecotourism infrastructure' proposals by the Queensland Government in national parks.	No change	The definition of limited tourist infrastructure provides some examples and states that the infrastructure and its use by visitors have a low impact on the integrity of land in the Area. Consideration of any proposed activity inside the Area will be subject to the principles and criteria for deciding permit applications. This includes consideration of prudent and feasible alternatives (i.e. construct outside the Area).
No commercial tourist accommodation should be	No change	The Management Plan does not have specific provisions to regulate commercial leasing.
permitted on crown tenures within Wet Tropics. Such developments, like 'nature-based tourist parks' and 'nature-based tourist accommodation' have no place within a world class World Heritage Area. Such accommodation should be provided on private lands (including indigenous)		Queensland Parks and Wildlife Service regulates commercial activity and leasing under the <i>Nature Conservation Act 1992</i> . If an activity is assessed to have impacts on WHV and integrity, the Authority has powers to refuse a permit or include conditions on a permit.
adjacent to the Area. Regulation of domestic activities—allow landholders within the Area to develop their own water and power supplies. This is acceptable provided all related infrastructure and resources used are located within their own property and there is no impact on the Area.	Noted	No further comment.
Undesirable plants and animals—cattle are considered as undesirable animals but are allowed outside of rainforest areas. This must be ensured by requiring appropriate fencing and that activities	Noted	No further comment.

do not compromise World Heritage standards.		
Landholders should be required to demonstrate the presence of adequate structures that will restrict any pets and ensure no disturbance to wildlife in the adjoining World Heritage Area.	Noted	The proposed amendments include a provision to develop a guideline about the ways a cat or dog may be kept. The Strategic Plan will also support strategic compliance activities with Rainforest Aboriginal Peoples, local government and other relevant organisations.
There is no mention of equines as being either permitted or undesirable. We consider them to be very undesirable. They are a large, hard hoofed herbivores that cause erosion impacts and trampling and are very efficient dispersers of weed seeds.	No change	The Management Plan does not regulate horses. Land managers such as Queensland Parks and Wildlife Services already regulate horses.
Submission 22		
Enabling appropriate visitor infrastructure— opposed to giving national park lands to private commercial interests. The state government has already begun alienating national park land for private commercial interests, independently of any offsetting arrangements.	Noted	The Management Plan does not have specific provisions to regulate commercial leasing. Queensland Parks and Wildlife Service regulates commercial activity and leasing under the <i>Nature Conservation Act 1992</i> . If an activity is assessed to have impacts on WHV and integrity, the Authority has powers to refuse a permit or include conditions on a permit.
Recommend that the Authority take into account the carbon cost of Tourism.	Noted	The Authority appreciates the feedback on potential management and research activities within the Area.
Roads—concerned that the failure to close disused roads will trigger a new infrastructure-demand cycle. Not permanently closing these roads will lead to new tourism proposals born in the knowledge that these once-discarded roads are now available to be reopened. See our other remarks about tourism.	No change	See response to Submission 49 under recommendation 11. Any application to open a new road would be subject to the principles and criteria for deciding permit applications. Opening a road to the public in the future may require further assessment and approval by the Authority and the relevant land manager. This includes community considerations, and the Authority would direct the applicant to consult all relevant parties.

Undesirable plants and animals—the notion of balancing social and economic benefits of keeping some undesirable animals is inappropriate. The appropriate bench mark is 'ensure there can be no impact on Wet Tropics World Heritage Area values'.	No change	The Authority recognises the potential impact of domestic dogs and cats on native animals, however if properly kept, their impact can minimised. The proposed amendments retain the ability to keep a cat or a dog in compliance with local laws and in a manner that minimises relevant risks. The proposed amendments include a provision to develop a guideline about the ways a cat or dog may be kept. The Strategic Plan will also support strategic compliance activities with Rainforest Aboriginal Peoples, local government and other relevant organisations.
Strongly supports limiting grazing of animals in the Area to cattle.	Noted	No further comment.
ASH strongly recommends against allowing cats to be bred or kept within the Area.	No change	The Authority recognises the potential impact of domestic dogs and cats on native animals, however if properly kept, their impact can minimised. The proposed amendments retain the ability to keep a cat or a dog in compliance with local laws and in a manner that minimises relevant risks. The proposed amendments include a provision to develop a guideline about the ways a cat or dog may be kept.
Strongly supports the removal of mining from the Plan.	Noted	No further comment.
Strongly opposed to the use of offsets within or adjacent to the Area for any private commercial interests. This includes permitted uses, which must be uses compatible with causing no damage to the Area.	Noted	Offsets are applied where there is a significant residual impact on the environment or ecosystem. In all cases the Authority manages development to avoid significant impact on WHV and on the Area's integrity. The Authority has maintained the capacity to apply particular conditions on permits that can prevent or minimise any adverse impacts.
		The Authority is proposing to strengthen this by including a provision that will enable conditions on permits that will contribute to achieving the primary goal, including, for example, by carrying out the proposed activity in association with another activity (an associated activity). Regarding visitor infrastructure, the Wet Tropics World Heritage Area is an exceptional landscape. It warrants concerted efforts to

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		provide the highest quality standards in presentation, including a diversity of experiences to allow residents and visitors to enjoy and appreciate the values of the Area. Of course, this needs to be balanced with ensuring that there are no negative impacts on the Areas OUV.
Submission 37		
Improved zoning system— recommend strict protection zones especially where there are species of significance. These areas would benefit from exclusion zones to protect natural heritage, scientific zones should also be considered where species could be studied and developed where necessary.	No change	All land in the Area is managed to 'protect and conserve the world heritage values and integrity of land in the zone'. Consideration of any proposals inside the World Heritage Area will be subject to the principles and criteria for deciding permit applications. This allows case by case consideration of a proposed activity and rules out activities that would compromise the WHV. Scientific research can occur in any zone. A specific zone is not required.
Enabling appropriate visitor infrastructure sustainability, offsetting and climate change codes of conduct were generally agreed to be of importance for the strategic nonlegislative and legislative plans. Suggestions were made for these to be incorporated into infrastructure development, national park use, guiding, indigenous use and the application of permits.	No change.	Consideration of any proposals inside the Area will be subject to the principles and criteria for deciding permit applications. This allows case by case consideration of a proposed activity and rules out activities that would compromise the WHV. The Authority will develop a guideline for consideration of impacts on WHV and integrity to support the permit assessment process.
A pricing structure and fines notice for beaches of activities was recommended for civil procedure and natural heritage protection.	No change	 For any activity for which the Authority can issue a permit, the Authority has powers to: include conditions on a permit, that includes ability to request a security or performance bond for compliance with the permit (see s.52 (i) and (ii) in existing Management Plan) further penalty units apply if the permit holder breaches permit conditions These powers remain unchanged in the proposed amendments.

Bushwalking was noted as a popular community activity that could be restricted to specific areas, times of year and presentation zones.	No change	The Authority does not directly regulate access to the Area. In most cases access is managed by the land manager.
Other matters raised— support the additional recognition, support and provision for the strategic management of the Wet Tropics World Heritage Area implemented into the current plan for review based on the responses of consultation from phase 1. It is a joy to see the new directive of management particularly for community interpretation or enjoyment of the land areas.	Noted	No further comment.
We commend the Management Plan for its structural consistency with the Sustainable Planning Act 2009 (thought to mean the now Planning Act 2016) through the zoning and permit requirements to allow for applications of integrity in the management of impacts associated with activities reasonably required within the World Heritage Area.	Noted	No further comment.
Both the Strategic Plan and the Management Plan management would benefit from a more defined background with reference to the world heritage concepts of Gondwanaland, cultural sites, Indigenous land rights and those significant elements of the vegetation management.	No change	The Authority supports ongoing presentation of the Area, however additional background information about the Area can be presented using other mechanisms. For example, the Authority provides resources and information relevant to WHV on its website. In addition, the Authority partners with landholders, local government and the tourism industry to develop high quality and accurate interpretation material.
Would like to see new direction for natural	Noted	The Management Plan, zoning and permit system all apply to mangroves within the Area.

heritage management such as the increased protection of mangrove species included into management strategies. Submission 39		
Improved zoning system—proposes the Daintree Coast, (the coastal watersheds from the Daintree River to the Bloomfield River) be declared a special precinct management zone. This would be an additional zone under the amended plan that would include a combination of land already within the World Heritage Area, blocks and adjacent private lands that have OUV.	No change	Amendments to the boundary of the Area are a major process (i.e. a change to the World Heritage listing) that is outside of the scope of the current review process. The Management Plan can only address matters within the Area. The Authority welcomes further discussions regarding the purpose of the Special Precinct Management Zone.
Another issue to be considered is that the Daintree Coast Presentation is poor: • national parks struggle to maintain boardwalks and toilets • the high demand for distance walks is ignored • the ferry access point is tired and messy • signage is ad hoc, visually polluting and local government signage rules are ignored and unenforced • people are frequently in breach of planning regulations designed to set backhouses and businesses for aesthetic reasons.	Noted	The Authority has secured funding under the Heritage Grants program to develop a key a strategic assessment and plan for tourism—this will take the form of a future 'Wet Tropics Tourism and Destination Plan'. This plan will be developed over the next 12 months with the full participation of the conservation and tourism sectors and Rainforest Aboriginal Peoples. The intent is to undertake full public consultation, and to make the plan publicly available.
Need for a strategic approach to the management and presentation of the	Noted	The Authority has secured funding under the Heritage Grants program to develop a key component of a strategic assessment and plan for tourism— this will take the form of a future

Daintree Coast in its entirety by:

- developing a Daintree Coast Futures Plan (as agreed at the recent Daintree Joint Management Group) before any major infrastructure investment
- extensive engagement with the all stakeholders to explore ways of meeting infrastructure needs without compromising World Heritage values
- pressing for investment in planning, conservation and presentation as a priority.

'Wet Tropics Tourism and Destination Plan'. This plan will be developed over the next 12 months with the full participation of the conservation and tourism sectors and Rainforest Aboriginal Peoples.

The intent is to undertake full public consultation, and to make the plan publicly available.

In the interim, any proposals will be subject to the principles and criteria for deciding permit applications.

The Wujal Wujal and Cook shires to the North are proposing the Bloomfield Track be sealed for quicker access to the North and the tourism ring road.

Concern that this may lead to:

- the Daintree Ferry being replaced by a bridge
- the widening of the road to Cape Tribulation
- increased speed limits
- loss of scenic values
- threats to wildlife including the southern cassowary from faster, 24-hour traffic.

No change

The Authority acknowledges concerns raised regarding the Bloomfield Track.

Upgrading the road in this area would require a permit from the Authority and assessment under the principles and criteria for deciding permit applications. This would include consideration of the matters raised including community considerations.

5. Individual submissions

Submission 1

Submission	Authority's	Authority's response
3451111331011	position	radioney or esponse
The new Strategic plan should utilise online communication platforms to ensure that the plan remains a living document and has a role in the life of the community of the World Heritage Area. The Authority should also enhance its presence in political debates and regional environmental issues where there is an opportunity to enhance World Heritage outcomes and stewardship by the community.	Noted	The Strategic Plan is a web-based plan and the strategies and actions directly inform the Authority's annual work plans. Strategy 3—involve the community—includes actions to ensure that the Area has a role in the life of the community. The Authority appreciates the comments about Wet Tropics World Heritage matters.
Submission 2		
We are happy and proud to be one of the few privately owned properties within the management area. I have no further comments to add to the review.	Supported	No further comment.
Submission 3	I	
Zoning system— the zoning in the Management Plan should be amended to include powers to make regulatory notices and issue fines.	No change	The Authority has investigated Restricted Area Activity Declarations (RAAD) as a management tool in previous reviews. The broad powers which such provisions would provide in terms of ability to restrict, as yet, unspecified activities have raised concerns regarding potential significant impacts on a landholder's or native title holder's interests. The Authority has decided not to proceed with seeking to introduce RAAD provisions in the proposed amendments.
		The Authority remains committed to working with the relevant Rainforest Aboriginal Peoples, land managers and other stakeholders to manage impacts on the Area.
Visitor infrastructure—limited controls under the Management Plan to address unchecked public access to sensitive areas with complex underlying tenure.	No change	The Management Plan does not directly regulate access to the Area. Individual land managers regulate access. The Authority will continue to work with the Traditional Owners and other landholders to ensure access to sensitive areas are adequately managed or restricted.

Extensive visitation has resulted in hundreds of trees and riparian vegetation killed, cassowary chicks killed by dogs, turtles and fish also killed by public recreation. Unsupervised, unmanaged public recreation, known to have continued over 24 years has destroyed this World Heritage global treasure. Uncontrolled, unsupervised, unacceptable behaviour by the public at large at a sacred Aboriginal site has continued over 30 years.	No change	The Authority is committed to working with the relevant registered native title bodies corporate and local government and relevant state government departments to support the future management of the Area. The Authority recognises that alternative recreation/swimming areas may need to be identified to provide alternatives for visitors.
Undesirable plants and animals—feral pigs are an introduced species that are breeding out of control. National parks have become sanctuaries for these animals. Eradication of these pests is vital to the well-being of the Wet Tropics Area.	Agreed	The Authority is concerned about a number of invasive plants and animals within the Area, pigs being one of these. The Authority will work with relevant agencies and land managers to develop more strategic and targeted approaches to biosecurity incursions.
Submission 5		
Undesirable plants and animals—pig hunting and blooded dogs on the rise, increased wildlife loss to feral and unsupervised dogs and cats. Pig hunting needs to be managed—concerned that	Agreed	The Authority recognises the potential impact of domestic dogs and cats on native animals, however if properly kept, their impact can minimised. The proposed amendments retains the ability to keep a cat or a dog in compliance with local laws and in a manner that minimises relevant risks.
local government is not addressing these issues.		The proposed amendments include a provision to develop a guideline about the ways a cat or dog may be kept. The Strategic Plan may also support strategic compliance activities with Rainforest Aboriginal Peoples, local government and other relevant organisations.
Other issues considered— farm fencing causing harm and loss to wildlife (esp. top line in barbed wire). Education required about replacing bird nests in trees	No change	The Authority supports ongoing education for landholders and neighbours. The Management Plan will not be directly regulating fencing type.
when fruit picking		If rinsing of chemical tanks in streams is detected, it should be reported to the Department of Environment and Science.

farmers rinsing chemical tanks and refilling them from rainforest waterways.		
Submission 6		
Improved zoning system— very happy with the reclassification from B to A because there were some restriction of access to areas such as Cedar Bay (walking from Weary Bay in the South), potentially Roaring Meg Falls, North Cowie Beach, etc. under the old system.	Noted	The Management Plan does not specifically regulate access to the Area. The Management Plan regulates development activities.
Enabling appropriate visitor infrastructure—judgement on a case by case situation. For example, would not like to see more resorts, but would welcome things like toilets in some areas.	Noted	Consideration of any proposals for visitor infrastructure is subject to the principles and criteria for deciding permit applications. The Authority has secured funding under the Heritage Grants program to develop a key component of a strategic assessment and plan for tourism— this will take the form of a future 'Wet Tropics Tourism and Destination Plan'. This plan will be developed over the next 12 months with the full participation of the conservation and tourism sectors and Rainforest Aboriginal Peoples. The intent is to undertake full public consultation, and to make the plan publicly available.
Recognising Aboriginal tradition—yes, as long as there is no significant overall restriction to access to nonaboriginal people.	Noted	No further comment.
Regulation of domestic activities—depends on which activities (i.e. restricting tree clearing for example is good).	Noted	No further comment.
Undesirable plants and animals—yes, would especially like to see control of the pig population.	Agreed	The Authority is concerned about a number of invasive plants and animals within the Area, pigs being one of these. The Authority will work with relevant agencies and land managers to develop more strategic and targeted approaches to biosecurity incursions.
Subdivision—we don't think there should be any more subdivision of allotments.	Noted	The Authority is introducing the ability to regulate subdivision to ensure that where there is potential under a local government planning scheme, the Authority is involved to ensure cumulative impacts are minimised.

Submission 7

Enabling appropriate visitor infrastructure—you seem to be going overboard on flexibility in allowing visitor facilities. Let your flexibility be tempered by keeping in mind that protecting the natural environment of the Wet Tropics is paramount; visitors come second and visitors won't come at all, if the environmental values are destroyed.

Noted

It is already possible to apply for a permit under the existing Management Plan to construct 'visitor facilities' in zone C (see: zone C management purpose). Allowing consideration of 'developed visitor infrastructure' (and defining what this means), clarifies the types of infrastructure that may be considered.

The intent of collapsing zones D and C together is not to increase the amount of tourism infrastructure, but to provide opportunity for tourism in the most appropriate places to present the Area.

Consideration of any proposals for 'developed visitor infrastructure' in zone C would be subject to the principles and criteria for deciding permit applications.

However, in response to submissions the Authority has further clarified the management purpose for zone C in a subsequent version of the proposed amendments as follows: 'Another management purpose of zone C is to ensure, so far as is reasonably practicable, that any visitor infrastructure on land in the zone is built and maintained in a way that—

- (a) is ecologically sustainable; and
- (b) is sensitively integrated into the surrounding landscape; and
- (c) increases visitors' understanding and appreciation of the natural and cultural heritage of the Area.'

The Authority agrees that further stakeholder discussion and guidance is required to better define appropriate tourism in the WHA, such as a strategic assessment plan for tourism.

Reducing impacts of community services infrastructure—I have some concerns about rezoning from zone B to zone C. Have you considered requiring a landswap in those cases? Mostand, indeed, probably all authorities requesting such a rezoning will own or have control of zone C land that

No change

The Authority is not considering land swaps as a component of rezoning.

Rezoning of land from zone B to zone C will only be considered if it is demonstrated that it is essential community service infrastructure for communities in the Wet Tropics region.

could reasonably be rezoned to zone B.		
Roads—most of your road classification amendments seem pretty good.	Noted	No further comment.
Regulation of domestic activities—no cat owner (and probably no dog owner) keeps his or her animals 'in a way that doesn't threaten native wildlife' one hundred per cent of the time. The only way to keep native wildlife safe is to forbid keeping cats or dogs within the Area.	No change	The Authority recognises the potential impact of domestic dogs and cats on native animals, however if properly kept, their impact can minimised. The proposed amendments retain the ability to keep a cat or a dog in compliance with local laws and in a manner that minimises relevant risks. The proposed amendments include a provision to develop a guideline about the ways a cat or dog may be kept. The Strategic Plan may also support strategic compliance activities with Rainforest Aboriginal Peoples, local government and other relevant organisations.
If you are going to allow the grazing of cattle, an idea about which I have substantial reservations, you must allow the grazing of horses—they do far less damage to flora and soil than cattle do.	No change	The Management Plan does not regulate horses. Land managers such as Queensland Parks and Wildlife Services already regulate horses.
Mining and offsets—ban mining as it should have been done decades ago.	Noted	No further comment.
Subdivision—the Authority must have and exercise absolute control over subdivision of land in the Wet Tropics and over activities undertaken on such land. Local authorities will not afford the Wet Tropics environment the protection it needs and deserves.	Agreed	No further comment.
Other issues considered under Strategy 1: Climate change and other threats—with regard to the Strategic Plan, I am pleased to see the eradication of yellow crazy ants on the list of actions given the current dire state of affairs, it might well be appropriate to move crazy ant	Noted	The Authority appreciates the feedback for this strategy. Please note, the order of actions under each strategy does not indicate priority.

eradication up to Action 1.1 and let the other actions follow in its wake. Strategy 5: minimise impacts—in the text of the section on minimising impacts, you say you work with stakeholders to get the balance right between protection of the (environmental) values and allowing development. I'm not convinced you have managed to get the balance right as it seems to me development and developers get too much license, too much leeway. I urge less development and more protection.	No change	The Management Plan applies to all development activities within the Area. Consideration of any proposals inside the Area will be subject to the principles and criteria for deciding permit applications. This includes consideration of any impacts on WHV and integrity, and prudent and feasible alternatives (i.e. construct outside the Area).
Enabling appropriate visitor infrastructure—'The Blue Hole' is a sacred site that has been subjected to rampant, ongoing and irreversible damage. The Strategic Plan must ensure that areas of such biological and cultural importance are protected forever.	Noted Noted	The Authority notes the recent proposed transfer of land adjacent to the Blue Pool to the relevant RNTBC/Land Trust and release of the revised Blue Pools Management Plan (2019). The Authority supports the ongoing management of this area by the RNTBC, local government and other relevant state government departments. The Authority recognises that alternative recreation/swimming areas may need to be identified to provide alternatives for visitors. The Authority has secured funding under the Heritage Grants program to develop a key component of a strategic assessment and plan for tourism – this will take the form of a future 'Wet Tropics Tourism and Destination Plan'. This plan will be developed over the next 12 months with the full participation of the conservation and tourism sectors and Rainforest Aboriginal Peoples.
Other issues considered are the Authority's redirection policy has been in effect since 1996. In 2012, The Authority's Board informed the community that this offensive policy had been removed as requested. We note that it is	No change	The Authority is unaware of any 'redirection policy'. Strategy 4, Action 4.1 of the Strategic Plan states the Authority may develop a dispersal strategy in line with the brand story to identify diversity in visitor experience opportunities and unique selling points for various locations throughout the Area. This action will be

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still in the present management plan. We ask that this new Plan		supported by the future Wet Tropics Tourism and Destination Plan and is not intended to distort or fragment the market.
makes every effort to maintain a level playing field. Subsidised tourism within the World Heritage Area has distorted and fragmented the market place.		Also, see response above.
Other issues considered—a major oversight seems to have been the presumption of underlying statutory authority across the entire World Heritage Area, when, in fact, freehold lands have no such provision and rather rely upon the protective partnership of the Authority.	No change	The Authority has investigated restricted access areas as a management tool in previous Management Plan reviews. The broad powers which such provisions would provide in terms of ability to restrict, activities have raised concerns regarding potential impacts on a landholder's or native title holder's rights and interests. The Authority has decided not to proceed with seeking to introduce these provisions in the proposed amendments.
Propose that the Management Plan include provisions to issue regulatory notices and declarations of restricted access areas.		The Authority remains committed to working with the relevant Rainforest Aboriginal Peoples, land managers and other stakeholders to manage impacts on the Area.
Submission 10		
Other issues considered—this is a national park management issue. I am concerned with excessive clearing of trees along walking tracks and often get asked by tourists why these trees are being cut down. I assume it's some nebulous excuse of safety, even though they are usually perfectly healthy.	Noted	Queensland Parks and Wildlife Service undertakes management of walking tracks on the National Parks estate. The Authority requests additional details on the clearing activity to investigate further.
I would like the Authority to include some covenant as to how roadsides and railway easements as well as power lines easements are to be managed. There should be a prohibition of the use of roundup along any roads going through World Heritage Area. There are alternatives nowadays and the Wet Tropics should encourage best practice.	Noted	The Authority administers maintenance permits with community service infrastructure providers within the Area. This includes conditioning their use of herbicides.

Regulation of domestic activities—for properties within or adjoining the World Heritage Area, I would like to see a prohibition of cats and dogs.	No change	The Management Plan does not apply outside of the Area. Local government requirements apply in these circumstances.
Submission 11		
Improved zoning system— object to the proposed zone changes from B to A and C to B on two lots adjacent to Noah Creek. These changes ignore existing use of the area previously zone C.	Agreed	This issue has been resolved with the submitter. The Authority has amended the zoning in this area to reflect existing use rights.
Submission 12		
Improved zoning system (recommendation 1)—reject the amalgamation of zone A and B.	No change	The Authority's Intent is to strengthen the level of protection for zone A under the amendments to the Management Plan.
anu b.		The Management Plan amendments do not allow any additional development in zone A that is not already allowed under the current plan.
Recommendation 2—do the necessary work as originally intended, to survey and certify when particular parts of zone B have been satisfactorily rehabilitated for recruitment to zone A.	No change	The purpose of zones in the amended Management Plan is to describe the management purpose, not the existing integrity or condition of any particular area of land. Zones are not a monitoring tool. Measuring values is best done through other approaches such as Biodiversity and Assessment Mapping Method (BAMM), and reported through mechanisms such as annual State of the Wet Tropics Reports and Outlook (IUCN) reports etc.
Recommendation 3—if zones A and B are amalgamated, the new zone be named zone A: Priority Protection.	No change	The Authority proposes to maintain the current zone names.
Climate change—identify and delineate the species and ecosystem risk (future loss) and refugia (future retention) areas, these should be used to inform a change in zoning to give highest priority to their conservation.	No change	The Authority is responding to the impacts of climate change via the Strategic Plan (Strategy 1) not the zoning system. Work has commenced on the actions identified under this strategy and Authority has launched a Climate change adaptation plan for the Area.
Enabling appropriate visitor infrastructure (recommendation 1)— formally define 'visitor	Agreed	The Authority has removed the examples of 'nature-based tourist park' and 'nature-based tourist accommodation from the definition of developed visitor infrastructure.

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infrastructure' and 'tourism accommodation' to make it very clear that it precludes any development which is not consistent with the primary objective of protecting and managing the natural heritage (OUV) values of the Area.		In response to submissions the Authority has further clarified the scope of developed visitor infrastructure under the management purpose of zone C. Developed visitor infrastructure must be developed and managed to be ecologically sustainable, sensitively integrated into the surrounding landscape, and to increase visitor appreciation and understanding of natural and cultural heritage.
Recommendation 2—preclude expanded 'visitor infrastructure' from old zone A and/or equivalent part of new zone A (A + B).	Interpretation issue	The interpretation that the changes to zone A management purpose and amalgamation of zone A and B have lowered protection and allowed additional development activities is incorrect. The Authority's intent in the amended Management Plan is to provide additional clarity on the type of infrastructure that may be considered in zone A.
		The proposed amendments do not allow any additional development in zone A that is not already allowed under the current Management Plan.
Recommendation 3— recognise that with a boundary of 3,000 km, there is an abundance of opportunities on private land for 'tourism development', including 'tourism accommodation' outside the Area. Recommendation 4—preclude	Noted	Consideration of any proposals that involve accommodation inside the Area will be subject to the principles and criteria for deciding permit applications. This includes consideration of prudent and feasible alternatives (i.e. construct outside the Area).
any new formal 'Tourism Accommodation' within the World Heritage Area.		
Recommendation 5—limit any new 'visitor infrastructure' (apart from walking tracks) to the footprint of previous disturbance. (There are thousands of km of public and logging roads throughout the Area. The line should be drawn to preclude any new infrastructure encroaching on	No change	Consideration of any proposals that involve accommodation inside the Area will be subject to the principles and criteria for deciding permit applications. This includes consideration of prudent and feasible alternatives (i.e. construct outside the Area).

areas not previously disturbed/high natural integrity). Roads—I am opposed to reopening of any and all old roads that are now formally closed or rehabilitated.	Noted	Any application to open a new road would be subject to the approval of the relevant land manager and a permit assessment process. The permit assessment process includes community considerations, and the Authority would direct the applicant to consult all relevant parties.
Subdivision recommendation—prohibit subdivision of any lot within the World Heritage Area.	No change	The Authority is introducing the ability to regulate subdivision to ensure that where there is potential under a local government planning scheme. The Authority is involved to ensure cumulative impacts are minimised.
Other issues considered: Strategic Plan (Strategy 1, Action 1.2)—extend the proposed action to include already established introduced species as a relevant part of Action 1:2.	Agreed	The Authority appreciates the feedback for this strategy and has made subsequent changes.
Recognising Aboriginal tradition—there is little information about how capacity building will take place for Rainforest Aboriginal Peoples. This should be incorporated into the statutory plan and the Strategic Plan.	Noted	Capacity building cannot be addressed in the Management Plan as it is a statutory tool for managing impacts on the Area. Permits and CMAs are mechanisms under the Management Plan that may be utilised to support capacity building. The Strategic Plan has had extensive editorial input and consultation from Rainforest Aboriginal Peoples. The plan is developed to guide the work of the Authority over the next 10 years and will result in more detailed work against the identified actions. The Authority is very active in this space already and will continue engage and work with Rainforest Aboriginal Peoples in meaningful and productive ways.
Other issues considered—cumulative impact of the proposed infrastructure changes must be considered. It is important to define cumulative impact and identify how cumulative impact will be measured within the Management Plan.	Agreed	The Authority acknowledges that cumulative impacts must be managed appropriately. Cumulative impact will continue to be considered under the proposed amendments to the Management Plan under Division 2: principles and criteria for deciding permit applications.

These comments relate primarily to the Strategic Plan:

- there must be explicit roles outlined for partnerships to increase accountability
- there is no costing within the plan. The Strategic Plan is not statutory, so there is no guarantee that the Authority will be able to deliver on the strategies outlined within the Strategic Plan
- none of the KPIs are explicitly measurable because they are all qualitative—it is important to have at least one quantitatively measurable KPI for each strategy.

Noted

The Authority appreciates the feedback on the Strategic Plan and Key Performance Indicators and will consider the proposed changes.

Submission 16

Improved zoning system—the proposed new zoning system is a step backwards not an improvement. Areas in zone A should be completely protected from visitors and retained for the value of their pristine nature. Any relaxation of protection puts added pressure on areas already dealing with climate change, weed and pest invasion without increasing the pressure by allowing further access.

No change

The Authority understands that the conservation sector are concerned that the change of the management purpose of each zone and clarification of the type of visitor infrastructure allowed in all zones is a weakening of protection for land in zone A. The Authority's Intent is to strengthen the level of protection for zone A under the new Management Plan.

The amendments to the Management Plan do not allow any additional development in zone A that is not already allowed under the current plan.

The word 'mostly' may have been misinterpreted. 'Mostly' refers to the fact that all land in zone A will be managed to 'protect and conserve the integrity of land in the zone', even if parts of the land are not currently of high integrity (i.e. still recovering from disturbance). The Authority has proposed to amend this wording to remove any confusion. It is already possible to apply for a permit under the existing Management Plan to construct 'visitor facilities' in zone C (see: zone C management purpose). Allowing consideration of 'developed visitor infrastructure' (and

Zone D should remain separate to zone C and protection under all zones should not be watered down.

No change

		defining what this means), clarifies the types of infrastructure that may be considered. The intent of collapsing zones D and C together is not to increase the amount of tourism infrastructure, but to provide opportunity for tourism in the most appropriate places to present the Area. Consideration of any proposals for 'developed visitor infrastructure' in zone C would be subject to the principles and criteria for deciding permit applications. However, in response to submissions the Authority has further clarified the management purpose for zone C in a subsequent version of the proposed amendments as follows: 'Another management purpose of zone C is to ensure, so far as is reasonably practicable, that any visitor infrastructure on land in the zone is built and maintained in a way that— (a) is ecologically sustainable; and (b) is sensitively integrated into the surrounding landscape; and (c) increases visitors' understanding and appreciation of the natural and cultural heritage of the Area.' The Authority agrees that further stakeholder discussion and guidance is required to better define appropriate tourism in the WHA, such as a strategic assessment plan for tourism.
Enabling appropriate visitor infrastructure—visitor infrastructure should be kept to a minimum. Tourists do not need access to protected areas in order to understand the beauty of the area or appreciate its values. Virtual experiences can give them all they need without putting	No change	The Authority recognises and values the important partnership role that the local community plays in the management of the Area. However, the Authority has an obligation to present the WHV of the Area. This includes consideration of diverse cultural and natural experiences. Consideration of any proposals for visitor infrastructure in the Area would be subject to
extra pressure on what we are trying to safeguard. Tourists rarely remember holiday experiences for long and don't value the places they visit in the same way as residents do.		infrastructure in the Area would be subject to the principles and criteria for deciding permit applications. This includes consideration of prudent and feasible alternatives (i.e. construct outside the Area).
Regulation of domestic activities—people should be	Noted	No further comment.

encouraged and given incentives to use standalone		
solar, wind and battery		
backup power to avoid		
destructive infrastructure		
requiring tree clearing when		
connecting to the grid.		
Undesirable plants and animals—all domestic dogs and cats should be de-sexed and registered including working dogs.	No change	The Authority recognises the potential impact of domestic dogs and cats on native animals, however if properly kept, their impact can minimised. The proposed amendments retain the ability to keep a cat or a dog in compliance with local laws and in a manner that minimises relevant risks. The proposed amendments include a provision to develop a guideline about the ways a cat or dog may be kept.
Constanting to the last	0!	dog may be kept.
Greater resources should be made available to tackle feral cats, dogs, deer and weeds in protected areas. Better policing required of existing regulations to stop pig hunters taking dogs into protected areas and visitors taking dogs in national parks.	Agreed	The Strategic Plan will support strategic compliance activities with Rainforest Aboriginal Peoples, local government and other relevant organisations.
Submission 17		
Other issues considered—the Management Plan should take more vigorous leadership for researches on threatened wildlife species or other species that are susceptible to climate change.	Noted	The Authority appreciates the feedback on priority management and research activities within the Area.
These researches should be actively used as the base for the next Management Plan for 2030–2040.		
The mangrove areas in the Wet Tropics should also be studied more thoroughly since we have two new mangrove species discovered in last two years. There could be other unknown plants in mangroves and we should understand what we have here to provide proper a management plan in the future.	Noted	The Authority appreciates the feedback on priority management and research activities within the Area.

Submission 29

Improved zoning system—zone A is the zone of highest protection. Moving most of zone B into zone A looked impressive until the management intent of zone A changed to allow 'limited visitor infrastructure' and that wilderness aspects such as 'remote from disturbance' and 'no obvious management presence' would be removed from the definition.

No change

The Authority understands that the conservation sector are concerned that the change of the management purpose of each zone and clarification of the type of visitor infrastructure allowed in all zones is a weakening of protection for land in zone A. The Authority's Intent is to strengthen the level of protection for zone A under the new Management Plan.

The amendments to the Management Plan do not allow any additional development in zone A that is not already allowed under the current plan.

'Intended physical and social settings' was replaced with 'management purpose' to strengthen protection of WHV and integrity in each zone. This reduces ambiguity about how the land must be managed. It changes the emphasis of zone management from managing the land based on its current integrity, to managing the land as if it is all of high integrity.

This change corrects the inconsistencies in the current Management Plan. For example, there are many areas of current and proposed zone A that do not conform with the current physical and social setting, such as having an obvious management presence (e.g. management roads, walking trails, car parks and viewing platforms).

These amendments remove the ambiguity, leaving the management purpose as the only relevant consideration for that zone.

Visitor Infrastructure has also moved from zone D to C and with A and B combined, visitor infrastructure of some kind now covers the whole of the Area. 'Developed visitor infrastructure', 'nature-based tourist park' and 'nature-based tourism accommodation' have appeared in an expanded zone C. It's a clear downgrading of protection, quite alarming and

Agreed

It is already possible to apply for a permit under the existing Management Plan to construct 'visitor facilities' in zone C (see: zone C management purpose). Allowing consideration of 'developed visitor infrastructure' (and defining what this means), clarifies the types of infrastructure that may be considered.

The intent of collapsing zones D and C together is not to increase the amount of tourism infrastructure, but to provide opportunity for tourism in the most appropriate places to present the Area.

posing serious risk to the World Heritage Area.		Consideration of any proposals for 'developed visitor infrastructure' in zone C would be subject to the principles and criteria for deciding permit applications. However, in response to submissions the Authority has further clarified the management purpose for zone C in a subsequent version of
		the proposed amendments as follows: 'Another management purpose of zone C is to ensure, so far as is reasonably practicable, that any visitor infrastructure on land in the zone is built and maintained in a way that— (a) is ecologically sustainable; and (b) is sensitively integrated into the surrounding landscape; and (c) increases visitors' understanding and appreciation of the natural and cultural heritage of the Area.'
		The Authority agrees that further stakeholder discussion and guidance is required to better define appropriate tourism in the WHA, such as a strategic assessment plan for tourism.
Enabling appropriate visitor infrastructure—under our duties of the World Heritage convention, we must preclude any development which is not consistent with the primary objective of the World Heritage Area.	Noted	No further comment.
There are now several new undefined terms for tourism/visitor infrastructure. The new terms intentionally cause confusion and have to	Noted	The Authority has removed the examples of 'nature-based tourist park' and 'nature-based tourist accommodation from the definition of developed visitor infrastructure.
be suspect.		In response to submissions the Authority has further clarified the scope of developed visitor infrastructure under the management purpose of zone C.
		Developed visitor infrastructure must be developed and managed to be ecologically sustainable, sensitively integrated into the surrounding landscape, and to increase visitor appreciation and understanding of natural and cultural heritage.
There is now, no zone where protection is the sole purpose.	No change	The Authority understands that the conservation sector are concerned that the change of the management purpose of each zone and clarification of the type of visitor

		infrastructure allowed in all zones is a weakening of protection for land in zone A. The Authority's Intent is to strengthen the level of protection for zone A under the new Management Plan. The amendments to the Management Plan do not allow any additional development in zone A that is not already allowed under the current plan.
There is ample land all around the World Heritage Area that would suit all different types of eco-infrastructure. Zones A and B must leave it out. Limited low-key walking trails are not the problem, facilities billed as a 'world class attraction' planned for 10s of thousands per year have to have a deleterious outcome for the greater integrity of the protected area and its OUV.	No change	The Authority has secured funding under the Heritage Grants program to develop a key component of a strategic assessment and plan for tourism— this will take the form of a future 'Wet Tropics Tourism and Destination Plan'. This Plan will be developed over the next 12 months with the full participation of the conservation and tourism sectors and Rainforest Aboriginal Peoples. The intent is to undertake full public consultation, and to make the Plan publicly available. In the interim, any proposals will be subject to the principles and criteria for deciding permit
Phase 2 review certainly swings the management of the World Heritage Area on a multiple use concept where built infrastructure can potentially be carried out within the entire area. That is a very bad message to send out to the public. The whole Area is on the table to development of some kind.	No change	applications. The amendments to the Management Plan do not allow any additional development in zone A that is not already allowed under the current plan. It is already possible to apply for a permit under the existing Management Plan to construct 'visitor facilities' in zone C (see: zone C management purpose). Allowing consideration of 'developed visitor infrastructure' (and defining what this means), clarifies the types of infrastructure that may be considered. The intent of collapsing zones D and C together is not to increase the amount of tourism infrastructure, but to provide opportunity for tourism in the most appropriate places to present the Area. Consideration of any proposals for 'developed

		subject to the principles and criteria for deciding permit applications.
Other issues considered (Strategic Plan: Strategy 1) for climate change and other threats—based on draft documentation, the proposed action appears to be weak and too slow acting.	No change	The Authority has commenced activities as outlined in Strategy 1 of the Strategic Plan.
Submission 30		
Improved zoning system— your proposal to merge zones, I believe this is a grave mistake and I believe it has been introduced in a dishonest way because it has never once been mentioned in previous consultations.	No change	The proposal to merge zone A and B was a key proposed change communicated throughout phase 1. The proposal to merge zone C and D was proposed as part of the Phase 1 consultation process and discussed at the 2017 Environment Roundtable. Analysis of zone D sites indicated almost universal intersection with road infrastructure and zone C.
From an ecological view point merging A and B is done on a false premise. The stated reason given for merging 'B' forest into 'A' forest (to create a 92% of area forest zone) is that the zone 'B' forests have recovered. This is naive. Trees may have grown back but 'B' areas are far from functioning old-growth ecosystems.	No change	The purpose of zones in the amendments to the Management Plan is to describe the management purpose, not the existing integrity or condition of any particular area of land. Zones are not a monitoring tool. Measuring values is best done through other approaches such as Biodiversity and Assessment Mapping Method (BAMM), and reported through mechanisms such as annual State of the Wet Tropics Reports and Outlook (IUCN) reports etc.
Another cause of concern is the removal of 'wilderness concepts' from zone definitions such as "remote from disturbance" and "no obvious management presence" from zone 'A'.	No change	'Intended physical and social settings' was replaced with 'management purpose' to strengthen protection of WHV and integrity in each zone. This reduces ambiguity about how the land must be managed. It changes the emphasis of zone management from managing the land based on its current integrity, to managing the land as if it is all of high integrity. This change corrects the inconsistencies in the current Management Plan. For example, there are many areas of current and proposed zone A that do not conform with the current physical and social setting, such as having an obvious management presence (e.g. management

		roads, walking trails, car parks and viewing platforms). These amendments remove the ambiguity, leaving the management purpose as the only relevant consideration for that zone.
The proposal to merge 'C' and 'D' zone is also flawed. Zone 'D' identifies where tourism facilities, which may tend toward the 'mass' end of the market could be established.	No change	relevant consideration for that zone. It is already possible to apply for a permit under the existing Management Plan to construct 'visitor facilities' in zone C (see: zone C management purpose). Allowing consideration of 'developed visitor infrastructure' (and defining what this means), clarifies the types of infrastructure that may be considered. The intent of collapsing zones D and C together is not to increase the amount of tourism infrastructure, but to provide opportunity for
		tourism in the most appropriate places to present the Area. Consideration of any proposals for 'developed visitor infrastructure' in zone C would be subject to the principles and criteria for deciding permit applications.
		However, in response to submissions the Authority has further clarified the management purpose for zone C in a subsequent version of the proposed amendments as follows: 'Another management purpose of zone C is to ensure, so far as is reasonably practicable, that any visitor infrastructure on land in the zone is built and maintained in a way that— (a) is ecologically sustainable; and (b) is sensitively integrated into the surrounding landscape; and (c) increases visitors' understanding and appreciation of the natural and cultural heritage of the Area.'
		The Authority agrees that further stakeholder discussion and guidance is required to better define appropriate tourism in the WHA, such as a strategic assessment plan for tourism.
Climate—if a species is facing extinction because of heat increases then surely it deserves special attention, compared with areas and species that will not be so	No change	The purpose of zones in the revised Management Plan is to describe the management purpose only. Zones are not a monitoring or recovery tool. Measuring values or risk is best done through other mechanisms.

affected. Zoning can better facilitate this.		
Enabling appropriate visitor infrastructure—tourism can be better catered for using zones: Not all tourists are interested in a deep understanding of rainforest. But some are passionate and seek out more engagement. Zoning, being in essence a system of differentiation, is ideally suited to the differential needs and interests of a diverse tourist population.	Noted	The zoning system establishes definitions for the type of infrastructure that may be considered in each zone.
Also, what and where is meant by the concepts of 'nature-based tourist park' and 'nature-based tourism accommodation' remains a very worrying feature of your proposals.	Agreed	The Authority has removed the examples of 'nature-based tourist park' and 'nature-based tourist accommodation from the definition of developed visitor infrastructure. In response to submissions the Authority has further clarified the scope of developed visitor infrastructure under the management purpose of zone C. Developed visitor infrastructure must be developed and managed to be ecologically sustainable, sensitively integrated into the surrounding landscape, and to increase visitor appreciation and understanding of natural and cultural heritage.
S.65 of the old Management Plan should be retained in the new arrangements and any reference to roads made specific and legally water tight. It is a mistake to subsume roads within a vague meta-term of 'community infrastructure'.	Interpretation issue	The interpretation that s.65 reduces clarity regarding assessment requirements for roads is incorrect. The Authority's intent in amending s.65 is to ensure that the additional assessment requirements that applied to roads under the existing Management Plan continue to apply to roads, and now applies to all applications for new community service infrastructure. This represents a strengthening of the level of scrutiny of new community service infrastructure proposals.
Roads—ecologically your proposal to re-open the Culpa Road is almost insulting, and it is hard to believe that it is coming from mature forest	Interpretation issue	The Authority is not proposing to re-open these roads. Rather, we will retain roads with tourism potential on a map in the Strategic Plan. Any proposal to open these roads to the public in the future may require further assessment and

and land managers. The Culpa road cuts through the middle of the largest most remote block of rainforest within the entire Wet Tropics World Heritage Area. The Red Road should be maintained only for station access and walking and cycling activities. The idea that the Bump Track might also become vehicular is also misplaced.		approval by the Authority and the relevant land manager.
Recognising Aboriginal tradition—zoning can cater for the needs of the original and present owners. There may be areas where Traditional Owners wish to live and maintain a historical and cultural attachment to the land. It may be that some form of presence may be needed within all zones.	Agreed	The Authority proposes to support aspirations to live on country through CMAs in Subdivision 2 of the Management Plan. These agreements vary the zoning rules according to the agreement. A CMA must contribute to achieving the primary goal.
Regulation of domestic activities—concerned that the proposal is vague in what is entailed in 'domestic electricity', 'communications' and 'water supply'. There should be no clearing for underground services or for towers with overhead lines.	Agreed	Any application to undertake an activity will be assessed on a case by case basis against the principles and criteria for deciding an application.
Undesirable plants and animals—the proposals go soft on the keeping of cats and dogs within the management area. Both species should be deemed 'undesirable'. This is not to say they should be banned but instead allowed under a permit system.	No change	The Authority recognises the potential impact of domestic dogs and cats on native animals, however if properly kept, their impact can be minimised. The amended Management Plan retains the ability to keep a cat or a dog in compliance with local laws and in a manner that minimises relevant risks. The proposed amendments include a provision to develop a guideline about the ways a cat or dog may be kept. The Strategic Plan will consider strategic compliance activities with Rainforest Aboriginal Peoples, local government and other relevant organisations.

Offsets—offsets should hardly ever be contemplated. They are the bottom of the barrel in terms of management.	Noted	See response to submission 49 under recommendation 15.
Other issues considered Seek involvement of the conservation sector in any major developments and management decisions within the management area of the World Heritage Area.	Agreed	The principles and criteria for deciding permit applications includes community considerations. The Authority also has a guideline which describes the community consultation process for a permit application. See response to submission 49 under recommendation 16.
Submission 35		
Other issues considered (Strategic Plan: Strategy 3)— my detailed suggestions include amendments to the title and actions for Strategy 3 to support more empowerment, collaborating and participation.	Agreed	The Authority appreciates the feedback for each strategy and action and will consider the proposed changes.
Submission 36	I	
Roads—the suggested 500m [zone b] buffer [for roads] seems fair and achievable.	Noted	No further comment.
We support the Phase 2 changes—amended road classifications within our area. These being the H Road, Red Road, Culpa Road as presentation roads. Their needs to be further clarification around the Kennedy Falls Track as this is actually on Carron Cr Road. The Kennedy Falls Track diverts from this.	Noted	Please note that these roads have been removed from zoning maps with the agreement of the land manager but are retained in the Strategic Plan. It is not an allowed activity to operate a motor vehicle on a road not depicted on a zoning map.
We have concerns about these roads being taken off zoning maps. Concerns that if the strategic action plans changes or its implementation is not completed that these	No change	These roads have been removed from zoning maps with the agreement of the land manager as they are unsafe and have fallen into disrepair. Authority will retain roads with tourism potential on a map in the Strategic Plan.
roads will then be lost.	No change	The Authority has secured funding under the

		months with the full participation of the conservation and tourism sectors and Rainforest Aboriginal Peoples. The intent is to undertake full public consultation, and to make the plan publicly available.
Other issues considered—we look forward to working with National Parks and the Authority to provide access to this special part of the world.	Noted	No further comment.
Submission 38		
Improved zoning system maps should be developed now for areas never to be developed as a priority. Areas of low ecological value that could perhaps be identified for amenities and visitor experience. No area of high wilderness, remote, isolated, intact, of high ecological value, critical importance or high conservation value should ever be considered.	No change	The Authority's intent for the proposed zoning amendments is to strengthen the protection of values for which the Area is listed (World Heritage values). Consideration of any proposed activity inside the Area will be subject to the principles and criteria for deciding permit applications (Division 2). This assessment process requires consideration of the matters raised, including assessment of prudent and feasible alternatives (including undertaking the activities outside the Area). See also response to Submission 49 under recommendation 4 and 5.
Absolutely no new developments should be under private lease hold or sale and must always be owned and operated by the government to ensure the primary goal of the Wet Tropics is to protect the cardinal principle safe guarding ecosystems and biodiversity for future generations.	No change	The Management Plan does not have specific provisions to regulate commercial leasing. Queensland Parks and Wildlife Service regulates commercial activity and leasing under the <i>Nature Conservation Act 1992</i> . If an activity is assessed to have impacts on WHV and integrity, the Authority has powers to refuse a permit or include conditions on a permit.
Undesirable plants and animals—the draft amended plan will limit ownership to a single cat or dog which is a positive step.	Noted	Note: The proposed amendments will allow a cat and a dog to be kept by a landholder or native title holder in a way that minimises the relevant risk.
Concern regarding ability to enforce domestic animal management (dogs and cats).	No change	The Authority recognises the potential impact of domestic dogs and cats on native animals, however if properly kept, their impact can minimised. The proposed amendments retain

Many rural dog owners don't have their dogs fenced to their house block.		the ability to keep a cat or a dog in compliance with local laws and in a manner that minimises relevant risks. The proposed amendments include a provision to develop a guideline about the ways a cat or dog may be kept. The Strategic Plan may also support strategic compliance activities with Rainforest Aboriginal Peoples, local government and other relevant organisations.
Freehold land adjoining the World Heritage Area is the greatest land area in need of protection. The authority could write regulations (Management Plan) on cats and dogs adjoining the Area—this would have a great impact on predation and harassment. Caravan and holiday parks adjoining the Area should not be permitted to be pet friendly.	Noted	The Management Plan does not apply outside of the Area. Local government requirements apply in these circumstances.
Other issues considered (Climate Change)—corridors, connectivity of high ecological value, conservation zones and buy back are desperately needed to increase the Area estate in the face of climate change.	Noted	See the Authority's Strategic Plan Action 1.1— the Authority treats the threat of climate change seriously and, in 2019, launched a Climate change Adaptation Plan for the Area.
Cassowaries are without any level of government protection from domestic dog attack within the Wet Tropics protected area.	Noted	Strategy 1, Action 1.4 of the Strategic Plan details the Authority's commitment to supporting the recovery of threatened species.
Submission 45		
Improved zoning system—the simplification of the zoning is well received. It is particularly appreciated that the new zoning system incorporates rehabilitated areas which is an acknowledgement of community efforts in restoring native vegetation.	Noted	No further comment.

Integration of current knowledge such as climate refugia in zoning maps is missing. This would add weight to priority conservation decisions.	No change	The purpose of zones in the revised Management Plan is to describe the management purpose only. Zones are not a monitoring tool. Measuring values is best done through other mechanisms. See response to Submission 49 under recommendation 3.
Buffer zones—question why these are not in place for the World Heritage Area to protect from impact of activities on the boundaries.	No change	The Authority will collaborate with neighbouring landholders as required. There are existing tools under the Management Plan and the Wet Tropics Act that can make provision for financial, scientific technical or other assistance in relation to the management of the Area.
Zone C and zone B—the buffers specifically generated by roads in the Area could be used as instruments to manage rubbish in these areas including the establishment of local clean-up committees for key range roads.	Noted	The Strategic Plan can explicitly address these matters under Strategy 3 and 5.
Zone boundary changes for conservation—current proposal for minor change to a zone boundary deals with changes to allow negative impacts. Can this be expanded to recognise the cessation of an existing land use practice?	No change	The Authority is not considering applying zone boundary changes in this way.
Recognising Aboriginal tradition—harvesting of plants and animals should be done in a traditional way, should ensure the maintenance of sustainable populations of harvested species. Recommend that CMAs are used to align conservation measures for these species with the recognition and exercise of traditional rights to harvest these species.	Noted	The Management Plan does not regulate native title harvesting rights. However, the Authority is supportive of sustainable practices within the Area. The Authority supports the use of CMAs to ensure that areas of high integrity and essential habitat are protected.
Domestic activities—concern about gardens and fruit orchards on these lands. What measures are in place to prevent the spread of alien plants?	Noted	The planting, cultivating, or propagating, killing of an undesirable plant is a prohibited activity under the Management Plan. Local government may also have conditions relating to exotic species.

Undesirable plants and animals—support conditions for keeping dogs, cats, honey bees and cattle within the Area. Encourage the Authority to prepare guidelines and to enforce the conditions and guidelines.	Noted	The proposed amendments include a provision to develop a guideline about the ways a cat or dog may be kept that minimises the relevant risk. The Strategic Plan will consider strategic compliance activities with Rainforest Aboriginal Peoples, local government and other relevant organisations.
It should be made clear that the list of undesirable animals does not include the dingo, (canis dingo) as the role of dingos in tropical ecosystems has now been acknowledged.	Noted	No further comment.
Mining—support banning of mining in the Area. Can the new plan clearly state that it will incorporate subsequent amendments to the Wet Tropics Act?	Noted	Amendments to Management Plan regarding mining are contingent on amendments to the Wet Tropics Act.
Subdivision—the Authority should maintain and increase cooperative partnerships with local governments as there is no requirement for local government to consult regarding development applications adjacent to the Area's boundary.	Noted	No further comment.
Submission 46		
Improved zoning system The Review proposes a zone B buffer of 500 m either side of the centreline of linear infrastructure. Local governments as well as any other providers of essential community infrastructure should know by now what, if any, additional zone C areas they might need during the next 10 years. There is no need for such a large buffer.	No change	Zone B is managed as for zone A. The zone B buffer provides strong conservation outcome and a mechanism to consider essential community service infrastructure requirements. This does not mean the Authority must grant a rezoning. All applications for rezoning will be considered on a case by case basis and must demonstrate that there are no prudent and feasible alternatives or net adverse impacts on the Area.
Undesirable plants and animals—every landholder or native title holder can have a cat or dog. I think you know even if only some of these residents have entire animals many will not be constrained, and they will reproduce.	No change	The Authority recognises the potential impact of domestic dogs and cats on native animals, however if properly kept, their impact can be minimised. The proposed amendments retain the ability to keep a cat or a dog in compliance with local laws and in a manner that minimises relevant risks.

Submission 21		
Request that the Authority change the current zoning adjacent to Southedge Road to zone C along its entire length. Alternatively, retain existing zoning (predominantly zone B) and strongly oppose the proposed change in zoning classification from zone B to zone A.	No change	Only public roads have an adjacent zone C. It would be inconsistent with the Management Plan to establish a zone C adjacent to a road that exists for management purposes. Retaining existing zoning (a mixture of zone A, B and C) would be inconsistent with the Authorities approach to other management roads which do not have an associated zone C or zone B.
		The decision to amend zone B areas to zone A reflects the management intent for the area in which Quaid road is located.

6. Submissions from the Tourism Sector

Submission 26		
Submission	Authority's position	Authority's response
Improved zoning system— it is unclear how the proposed rezoning of large tracts of zone B land to zone A land will deliver the outcome of increased flexibility in the use and access of areas.	No change	The rezoning of land from zone B to A was the original intent of the Management Plan once significant recovery had occurred. The Management Plan and the proposed amendments do not change the activities that are allowed in zone A and zone B. The inclusion of a definition for limited visitor infrastructure provides clarity on the type of infrastructure that may be considered in this area.
Enabling appropriate visitor infrastructure—the inclusion of limited visitor infrastructure is supported however further scope around way finding principles, people management and connectivity should be considered to accommodate the growing number of visitors across the region.	Noted	The Authority recognises the concerns of the industry. The Authority will support a strategic assessment and plan for tourism—the future 'Wet Tropics Tourism and Destination Plan'. This plan will be developed over the next 12 months with the full participation of the tourism sector. The Strategic Plan, Strategy 4; World-class tourism and recreation also recognises that collaboration is essential in marketing, branding and diversification of natural and cultural tourism opportunities.
As technology evolves, it is likely that technology will play a changing role in	Noted	The definitions of limited and developed visitor infrastructure will accommodate new technologies that support access and

people management through national parks.		presentation of the Area to visitors, in line with the objective to maintain WHV and integrity.
Within the Management Plan there are definitions of 'developed' and 'limited visitor infrastructure', the extent of the definition is essentially 'providing access' and 'presenting the area to visitors or informing visitors about the area' which does little to illuminate tourism potential nor the supporting facilities required to ensure the tourism potential is delivered. The omission of the 'intended physical and social setting' section plus the re-wording of the management purpose within each zone has in some ways limited the practicable application of the plan even further.	Interpretation issue	The interpretation that the definitions of limited and developed visitor infrastructure should describe the tourism potential is incorrect. The Authority's intent is that these definitions describe the type of infrastructure that may be considered in each zone. Any application to develop new infrastructure will be assessed on a case by case basis and will also consider the supporting facilities required. The proposed amendments to the Management Plan state that allowing access for visitors to appreciate and enjoy to parts of the Area is a key purpose of all zones. Strategy 4 of the Strategic Plan clearly articulates the Authority's support for world-class tourism and recreation.
The new management purpose of zone C now simply allows community services and visitor infrastructure and emphasises protection and enhancement of integrity, plus minimising impacts. Within this, there is no explicit consideration of the needs, engagement or enjoyment of the community or visitors, the reference to these stakeholders has also concerningly been removed.	Interpretation issue	The interpretation that the changes to the management purpose of each zone limits the consideration of visitor needs, engagement and enjoyment is incorrect. The Authority's intent is to clarify in the proposed amendments that allowing access for visitors to appreciate and enjoy to parts of the Area is a key purpose of all zones. The Authority will support a strategic assessment and plan for tourism – the future 'Wet Tropics Tourism and Destination Plan'. This plan will be developed over the next 12 months with the full participation of the tourism sector. Strategy 4 of the Strategic Plan clearly articulates the Authority's support for world-class tourism and recreation.
The omitting of camping from s.28(2) is of concern. This is likely to have a	Interpretation issue	The interpretation that the removal of camping as an example from s.28(2) will impact existing businesses is incorrect.

detrimental impact on existing businesses operating within the Wet Tropics and may influence the length of stay and engagement with the region.		The Authority's intent is not to impact any existing business which involve camping. The Management Plan does not regulate camping in the Area. This is generally regulated by the land manager. Therefore, the use of camping as an 'example' of a minor and inconsequential impact was misleading and has been removed. The Authorities involvement in regulating camping in the Area is limited to the assessment of a permits required to construct limited or developed visitor infrastructure which may support commercial camping in the Area. Commercial activities on the National Parks
Roads—the road classification amendments are supported by stakeholders as are the	Noted	Estate are managed by Queensland Parks and Wildlife service. No further comment.
removal of permit duplication. It is understood that certain roads will be	Noted	The Authority will retain roads with tourism potential on a map in the Strategic Plan.
removed from zoning maps despite being traversable. It is suggested that the list of roads for removal is assessed by key stakeholders utilising the area prior to decisions being finalised.		Opening these roads to the public in the future may require further assessment and approval by the Authority and the relevant land manager.
Recognising Aboriginal tradition—the proposal to move to a joint managed model of operation Cape York Peninsular Aboriginal Land (CYPAL) model, underpinned by park specific Indigenous Management Agreements) may jeopardise current tourism operations. Consideration needs to be given to: protect the security of	No change	The Authority has not specifically proposed moving towards a CYPAL Joint management model in the Wet Tropics. The Authority is supportive of providing appropriate opportunities for Rainforest Aboriginal Peoples to have meaningful involvement in the management of the Wet Tropics of Queensland World Heritage Area (the Area), whether this be a CYPAL model of joint management or other mechanisms
tenure and commercial viability of existing		

commercial tourism operations • protect the sustainability of nature-based tourism within the State, particularly allowing for new product development • ensure adequate ongoing funding for National Park maintenance and upkeep.		
Other issues considered— there is ambiguity around the species management in this plan. Among others, possum and frog specifies are disappearing at an alarming rate yet there are no measures to protect or save these. A stronger approach to species management is required if we are to have any hope of saving these species.	Noted	The Management Plan does not explicitly address these matters. The Strategic Plan, Strategy 1 better addresses specific threats. The effect of the Management Plan is to regulate development to limit impacts on WHV and integrity. The Strategic Plan identifies actions the Authority will take to address threats to the Area; articulates a stronger approach to species management.
Tourism plays a significant role in the Wet Tropics experience and protection. The failure to provide a holistic strategy that places tourism at the heart of a response to climate change, community (whether Rainforest Aboriginal Peoples or local communities with their own rich culture and history), conservation and presentation is disappointing and a missed opportunity.	Noted	The Authority has launched a Climate Change Adaptation Plan that has been developed with input from the Tourism Industry as well as other sectors.
Strategic Plan (Action 1.1)—significant work has already been completed by the Queensland government in partnership with sector leads regarding climate adaptation and mitigation strategies for bio-diversity and tourism. It	Noted	See the Strategic Plan Action 1.1 and response above. Action 4.1—this is currently underway and the Authority has been working closely with the tourism industry.

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is integral that the		
Management Plan		
references and aligns with		
these plans to ensure a		
consistent, whole of state		
climate response.		- 1 • ·1 · · · · · · · · · · · · · · · · ·
Action 4.1—within this	Agreed	The Authority has been working closely with the
action item, there is no		tourism industry, on the brand strategy.
consideration of the role of		The Authority and sixted the foodback for each
the Regional Tourism		The Authority appreciates the feedback for each
Organisation (RTO). The RTO's role in Queensland is		strategy and has made subsequent changes.
to market the destination		
domestically, and to a		
lesser extent,		
internationally.		
It is integral that the		
development of the brand,		
the brand story and the		
values align with the		
broader destination and its		
branding. It is important		
that any marketing, or		
branding, efforts are done		
in a collaborative way with		
industry experts.		
Action 4.4—there is	Agreed	The Authority appreciates the feedback for each
significant opportunity in		strategy and will consider the proposed
this action item, in		changes.
particular through the		
development of additional		
walking tracks, Indigenous		
experiences and diversified		
experiences within the		
park. These developments		
must be market led. To		
ensure the success of		
tourism operations within		
the Wet Tropics region,		
growth needs to be driven		
by market demand, it must		
be both economically and		
environmentally sustainable.		
Current KPIs against this		
action have the potential to		
•		
push growth for growth		
sake, rather than creating a		

Strategy 2: Support No change The Authority does not agree that supporting Rainforest Aboriginal Rainforest Aboriginal Peoples to realise their Peoples—a concern arises tourism aspirations will threaten existing from the potential business. implications from the Plan for existing tourism The Authority has secured funding under the operators within the Wet Heritage Grants program to develop a key Tropics Area of which there component of a strategic assessment and plan is no reference to this in for tourism—this will take the form of a future this Plan. This is a major 'Wet Tropics Tourism and Destination Plan'. This omission that potentially plan will be developed over the next 12 months threatens the business with the full participation of the conservation and tourism sectors and Rainforest Aboriginal security of those operating Peoples. in the park. Support the enhanced partnership with Traditional Owners and the identification of new opportunities for further experience development, business formation and employment, sustainable development must also consider the continuation of existing business operations within the National Park. Action 5.3 to support No change See response above. negotiations of cooperative management agreements—there are concerns raised around the push for deriving economic benefits without effectively considering market demand, existing business and the sustainability of models or businesses introduced. Furthermore, as to point 4.4 consideration of new operations within the Area needs to be market led. Failure to approach the introduction of new businesses without understanding of demand will put the sustainability of these operations at risk. Submission 48

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Enabling appropriate visitor infrastructure— collaborate with relevant local tourism authorities in marketing efforts and ensure that new product is market driven and both economically and environmentally sustainable.	Agreed	The Strategic Plan, Strategy 4; World-class tourism and recreation also recognises that collaboration is essential in marketing, branding and diversification of natural and cultural tourism opportunities. The Authority appreciates this feedback on the Strategic Plan and has made additional changes to Strategy 4 to better recognise the role of the Tourism sector in delivering actions.
Roads—provide a list of roads that will be removed from zoning maps to stakeholders in the region for assessment prior to decision.	Noted	The Authority have consulted widely on these roads as part of Phase 1 consultation. These roads with tourism potential will be retained on a map in the Strategic Plan. Opening these roads to the public in the future may require further assessment and approval by the Authority and the relevant land manager.
Recognising Aboriginal tradition—the proposal to move to a joint managed model of operation Cape York Peninsular Aboriginal Land (CYPAL) model, unpinned by park specific Indigenous Management Agreements, may jeopardise current tourism operations. Consideration needs to be given to: • protect the security of tenure and commercial viability of existing commercial tourism operations • protect the sustaing commercial tourism operations • protect the sustaing commercial tourism operations • protect the sustainability of nature-based tourism within the state, particularly allowing for new product development • ensure adequate ongoing funding for National Park maintenance and upkeep.	No change	The Authority has not specifically proposed moving towards a CYPAL Joint management model in the Wet Tropics. The Authority is supportive of providing appropriate opportunities for Rainforest Aboriginal Peoples to have meaningful involvement in the management of the Area, whether this be a CYPAL model of joint management or other mechanisms.
Other issues considered are to work with the zoo community, wildlife parks and research institutes to develop effective species	Noted	The Management Plan does not explicitly address these matters. The Strategic Plan, Strategy 1 can better address specific threats and collaborative partnerships.

management plans.		
Submission 43		
Improved zoning system— support reclassifying zone B areas that have recovered from past disturbances to zone A.	Noted	No further comment.
We do not support allowing limited infrastructure in zone A. Visitors to zone A should continue to be able to expect to experience solitude in a natural area, requiring some self-reliance, and there to be no obvious signs of 'management' (beyond that to maintain integrity and values).	No change	'Intended physical and social settings' was replaced with 'management purpose' to strengthen protection of WHV and integrity in each zone. This reduces ambiguity about how the land must be managed. It changes the emphasis of zone management from managing the land based on its current integrity, to managing the land as if it is all of high integrity. This change corrects the inconsistencies in the current Management Plan. For example, there are many areas of current and proposed zone A that do not conform with the current physical and social setting, such as having an obvious management presence (e.g. management roads, walking trails, car parks and viewing platforms). These amendments remove the ambiguity, leaving the management purpose as the only relevant consideration for that zone. The amendments to the Management Plan do not allow any additional development in zone A that is not already allowed under the current plan.
Concerned that the removal of wilderness concepts from definition of zone A such as 'remote from disturbance' and 'no obvious management presence' will reduce the protection of biodiversity and other outstanding values.	No change	See response above.
Do not support combining zone D with zone C. We support retention of zone D and it being the area where the majority of infrastructure is situated.	No change	It is already possible to apply for a permit under the existing Management Plan to construct 'visitor facilities' in zone C (see: zone C management purpose). Allowing consideration of 'developed visitor infrastructure' (and

		defining what this means), clarifies the types of infrastructure that may be considered. The intent of collapsing zones D and C together is not to increase the amount of tourism infrastructure, but to provide opportunity for tourism in the most appropriate places to present the Area. Consideration of any proposals for 'developed visitor infrastructure' in zone C would be subject to the principles and criteria for deciding permit applications.
Climate refugia should be identified on zoning maps and any development that may impact on this excluded.	No change	The purpose of zones in the amended Management Plan is to describe the management purpose, not the existing integrity or condition of any particular area of land. Zones are not a monitoring tool. Measuring values is best done through other approaches such as Biodiversity and Assessment Mapping Method (BAMM), and reported through mechanisms such as annual State of the Wet Tropics Reports and Outlook (IUCN) reports etc.
Enabling appropriate visitor infrastructure— concerned that the addition of 'limited visitor infrastructure' in Phase 2 to proposed zone A will reduce the protection of biodiversity and other outstanding values.	No change	The proposed amendments do not allow any additional development in zone A that is not already allowed under the current Management Plan.
Concerned that 'developed visitor infrastructure' is being allowed in a much larger area due to incorporation of zone D into zone C will reduce the protection of biodiversity and other outstanding values.	No change	The intent of collapsing zones D and C together is not to increase the amount of tourism infrastructure, but to provide opportunity for tourism in the most appropriate places to present the Area. However, in response to submissions the Authority has further clarified the management purpose for zone C in a subsequent version of the proposed amendments as follows: 'Another management purpose of zone C is to ensure, so far as is reasonably practicable, that any visitor infrastructure on land in the zone is built and maintained in a way that— (a) is ecologically sustainable; and (b) is sensitively integrated into the surrounding landscape; and

Concerned that no definition of 'nature-based tourist park' and 'nature-based tourism accommodation' will reduce the protection of biodiversity and other	Agreed	(c) increases visitors' understanding and appreciation of the natural and cultural heritage of the Area.' The Authority agrees that further stakeholder discussion and guidance is required to better define appropriate tourism in the WHA, such as a strategic assessment plan for tourism. The terms have been removed from the definition of developed visitor infrastructure.
outstanding values. Concerned that visitor infrastructure definitions are not prescriptive and therefore open to interpretation will reduce the protection of biodiversity and other outstanding values.	Agreed	The Authority has removed the examples of 'nature-based tourist park' and 'nature-based tourist accommodation from the definition of developed visitor infrastructure. In response to submissions the Authority has further clarified the scope of developed visitor infrastructure under the management purpose of zone C. Developed visitor infrastructure must be developed and managed to be ecologically sustainable, sensitively integrated into the surrounding landscape, and to increase visitor appreciation and understanding of natural and cultural heritage.
The proposed zoning changes are substantial and have significant potential to increase development in the Area. Without strategic assessment and planning for tourism development at the World Heritage scale, proposals will be considered individually as they are received and may fail to identify and avoid potential cumulative impacts. This could have severe and irreversible impacts on the OUV of the Area. A strategic assessment of tourism	No change	The Authority has secured funding under the Heritage Grants program to develop a key component of a strategic assessment and plan for tourism— this will take the form of a future 'Wet Tropics Tourism and Destination Plan'. This plan will be developed over the next 12 months with the full participation of the conservation and tourism sectors and Rainforest Aboriginal Peoples. The intent is to undertake full public consultation, and to make the plan publicly available. In the interim, any proposals will be subject to the principles and criteria for deciding permit applications.

development, that includes extensive consultation with the conservation sector and other stakeholders, is essential prior to zoning change.		
Community service infrastructure—support the continued recognition that community infrastructure and essential services must have minimal impacts on the values of the World Heritage Area.	Noted	No further comment.
Roads—No specific comment providing there is no negative impact on values and there is full consultation with the community and stakeholders.	Noted	No further comment.
Recognising Aboriginal tradition—supports actions and cooperative management agreements that recognise Rainforest Aboriginal traditions in management of the Area.	Agreed	No further comment.
Domestic activities—in support the proposed changes.	Noted	No further comment.
Undesirable plants and animals—approve of tighter legislation on undesirable flora and fauna that may be kept outside of the rainforest area on private or native title lands, including tighter restrictions on grazing animals so that only cattle is allowed.	Noted	No further comment.
Creeks must be protected from cattle, agricultural chemicals and other pollutants and exotic fodder plants with potential to invade should not be planted or fed to cattle.	No change	As an allowed activity, grazing cattle will not require a permit. Where required, exotic fodder plants may be added to Schedule 2: undesirable plants.

Beekeeping should be registered by permit to ensure feral bee swarms do not establish. WTA supports regulating the movement of fish and crustaceans.	No change	Subject to conditions, bee keeping is an allowed activity for landholders or native title holders. A permit is not required. On the National Park estate a permit may be required.
Existing dogs and cats should be de-sexed, including working dogs. Cats should be kept indoors or in special cat runs and dogs in fenced yards on the property. In addition, dogs and cats should be banned in all new developments, except for conservation activities.	No change	The Authority recognises the potential impact of domestic dogs and cats on native animals, however if properly kept, their impact can be minimised. The proposed amendments retain the ability to keep a cat or a dog in compliance with local laws and in a manner that minimises relevant risks.
Mining-in support of amendments to the Wet Tropics Act to prohibit mining.	Noted	No further comment.
Offsets—agree with the conservation sector comments on proposed use of offsets.	No change	Offsets are applied where there is a significant residual impact on the environment or ecosystem. In all cases the Authority manages development to avoid significant impact on the WHV and on the Area's integrity. The Authority has maintained the capacity to apply particular conditions on permits that can prevent or minimise any adverse impacts. The Authority is proposing to strengthen this by including a provision that will enable conditions on permits that will contribute to achieving the primary goal, including, for example, by carrying out the proposed activity in association with another activity (an associated activity). Regarding visitor infrastructure, the Area is an exceptional landscape. It warrants concerted efforts to provide the highest quality standards in presentation, including a diversity of experiences to allow residents and visitors to enjoy and appreciate the values of the Area. Of course, this needs to be balanced with ensuring that there are no negative impacts on the OUV of the Area.
Other issues considered— permit application which have the potential to be significant should be subject to public comment,	Noted	The principles and criteria for deciding permit applications includes community considerations. The Authority also has a guideline which describes the community consultation process for a permit application.

not only when significant enough to trigger state or federal approval. Permit decisions in the Area should be subject to public appeal and all development permit applications and decision notices, including conditions, should be made publicly available.		
Climate Change may be the most important emerging threat to the Wet Tropics and to reflect this must be addressed as part of the statutory management plan.	Noted	The Authority is responding to the impacts of climate change in Strategy 1 of the Strategic Plan. Work has commenced on the actions identified under this strategy.
Supports strategic plan strategies and actions. Seeks further involvement in implementing the actions within the Strategic Plan.	Noted	The Authority appreciates the feedback for each strategy and supports future involvement in the delivery of specific actions.

Appendix A.

Public consultation

Phase one consultation (2017–2018)

- More than 2500 letters sent inviting views and 91 formal submissions
- Conservation, Tourism, Rainforest Aboriginal Peoples had special consultation processes
- Rainforest Aboriginal Peoples 8 Formal submissions received, 30 workshops and 2 regional workshops - regional Forum
- 91 formal submissions received during formal phase one consultation period

For more information on the issues raised during phase one see the consultation report here.

Phase two consultation (March–April 2019)

- · Public Notices in the Cairns Post, Townsville Bulletin, Courier Mail,
- · Letters to landholders, previous submitters and Councils,
- Media and social media releases.
- Notification to all advisory committees Community Consultative Committee (CCC), Scientific Advisory Committee (SAC) and Interdepartmental Committee.
- 49 formal submissions received during formal phase two consultation period.

Table 1 below includes details of phase 2 consultation by sector.

Table 1. Specific phase 2 consultation activities

Group	Consultation activity
Rainforest	detailed consultation with the Traditional Owner Leadership Group (TOLG)
Aboriginal	discussions with North Queensland Land Council including ongoing support
Peoples	 during the consultation phases of the Management Plan review. Specifically, a review of proposed amendments and native title implications, support to the Traditional Owner Leadership Group and support to 2018—2019 Rainforest Aboriginal Peoples Regional Forums discussions with Native Title Tribunal pre-advice to Rainforest Aboriginal Peoples regarding Future Act Notices (FAN) FAN sent (legislative act under NTA) workshops with Rainforest Aboriginal Peoples, Mossman, Cairns, Atherton, Cardwell Rainforest Aboriginal Peoples Regional Forum 2018 and 2019.
Conservation	 contract with Cairns and Far North Environment Centre (CAFNEC) to
sector	facilitate consultation with the conservation sector
	presentation at CAFNEC Management Plan review workshop
	 written response from Authority and ongoing discussions with CAFNEC regarding submission
	 CAFNEC presentation to the Wet Tropics Management Authority Board of Directors

Tourism industry	 targeted workshop with industry members Cairns & Port Douglas presentation and discussions with Alliance for Sustainable Tourism and other Tourism operators.
Local Government	 letters notifying phase 2 commencement and call for submissions printed zoning maps for all councils and request to display in council offices community service infrastructure data requests ongoing discussions with: Townsville City Council—roads, water infrastructure and tourism. Tablelands Regional Council—water infrastructure. Douglas Shire Council—water infrastructure, Wangetti Trail, road classification and depiction of infrastructure on zoning maps.
FNQROC	 presentation to FNQROC—Planners Forum and discussions with FNQROC—Roads and Transport Working Group (<i>pre-phase 2</i>) presentation to FNQROC—Mayors meeting presentation to DISDMIP—Planners Forum.
State and	Notification of phase 2 commencement and call for submissions.
federal	Discussions with:
agencies	 DES—Minerals & North Queensland Compliance Environmental Services & Regulation—mining
	 DES—Queensland Parks, Wildlife Services and Partnerships. (Regional Management team meeting, Ingham)
	 Department of Agriculture and Fisheries—regulating translocation of fish and crustaceans
	 Department of State Development, Manufacturing, Infrastructure and Planning—subdivision
	 Department of Innovation, Tourism Industry Development and the Commonwealth Games—recognising tourism opportunities
	Department of Natural Resources Mines and Energy—Clarifying Land Act 1994 implications for subdivision
	 Department of the Environment and Energy—ensuring consistency with the Environmental Protection and Biodiversity Protection Act 1999.