



Australian Government
Parks Australia



Report of the Director of National Parks

on the preparation of the

Uluṛu-Kata Tjuṛa National Park Management Plan 2021

Introduction

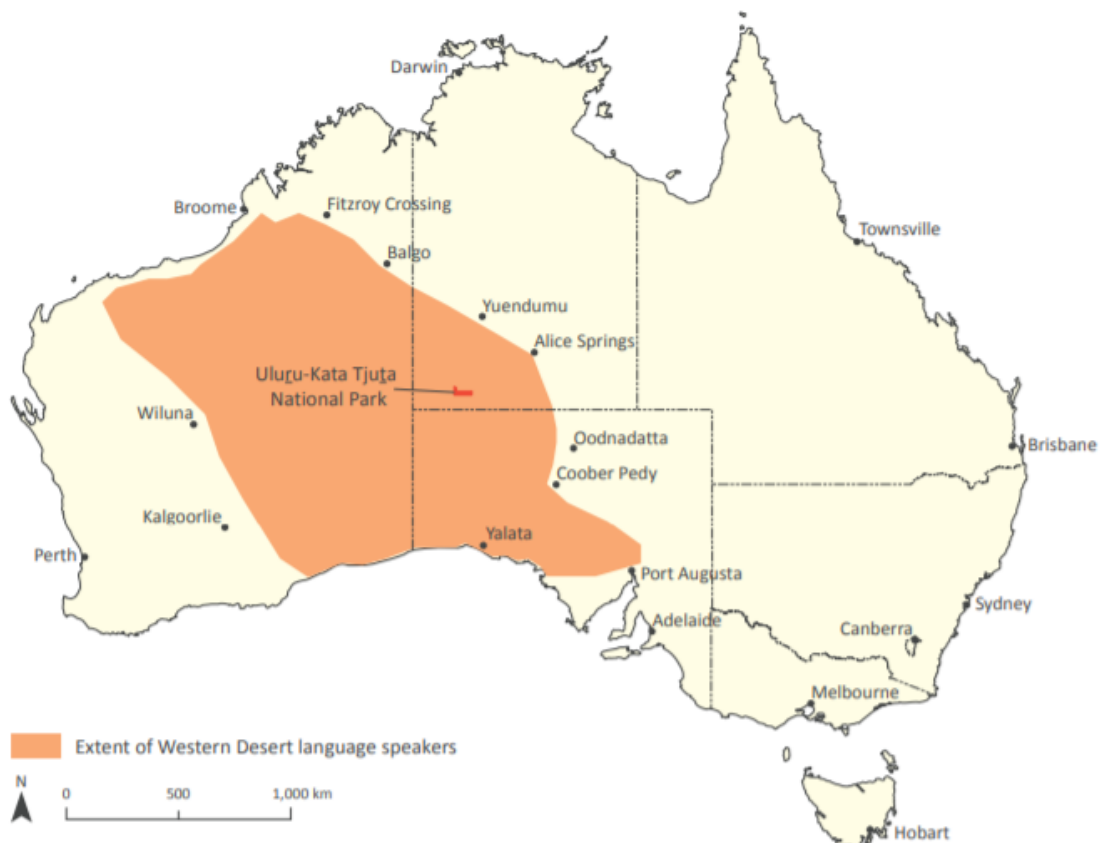
This is the sixth management plan prepared for the Uluru-Kata Tjuta National Park and it is made under the *Environment Protection and Biodiversity Act 1999* (EPBC Act). It will replace the fifth management plan which commenced on 9 January 2010, and ceased to have effect on 8 January 2020.

Since that later date, Uluru-Kata Tjuta National Park has been managed under s.357 of the EPBC Act, which states:

- (1) *While a management plan is not in operation for a Commonwealth reserve, the Director must exercise the Director's powers and perform the Director's functions in relation to the reserve or to a zone of the reserve so as to manage the reserve in accordance with:*
 - (a) *the Australian IUCN reserve management principles for the IUCN category to which the reserve or zone has most recently been assigned by:*
 - ... (ii) *a management plan that was in operation for the reserve (but is no longer)*

Uluru-Kata Tjuta National Park

Uluru-Kata Tjuta National Park is leased to the Director of National Parks by its Anangu owners, and is jointly managed by the Director and the Traditional Owners. *Tjukurpa* (law) is the foundation of Anangu life, and the park is managed using Anangu methods governed by *Tjukurpa* combined with western science and management practices. The park's first priority is conserving the significant natural and cultural values of the area.



***Park-angka unngu munu Park-angka urilta Tjukurpa palunyatu ngaranya kutjupa wiya.
Ngura miil-miilpa tjuta Park – angka ngaranya – uwankara kutju ngaranya,
Tjukurpangka.***

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It is one Tjukurpa inside the park and outside the park, not different. There are many sacred places in the park that are part of the whole cultural landscape—one line. Everything is one Tjukurpa.

The park's landscape is dominated by the iconic massifs of Uluru and Kata Tjuta. These two geological features are striking examples of geological processes and erosion occurring over time and provide associated refuge and habitat for a broad range of plant and animal species.

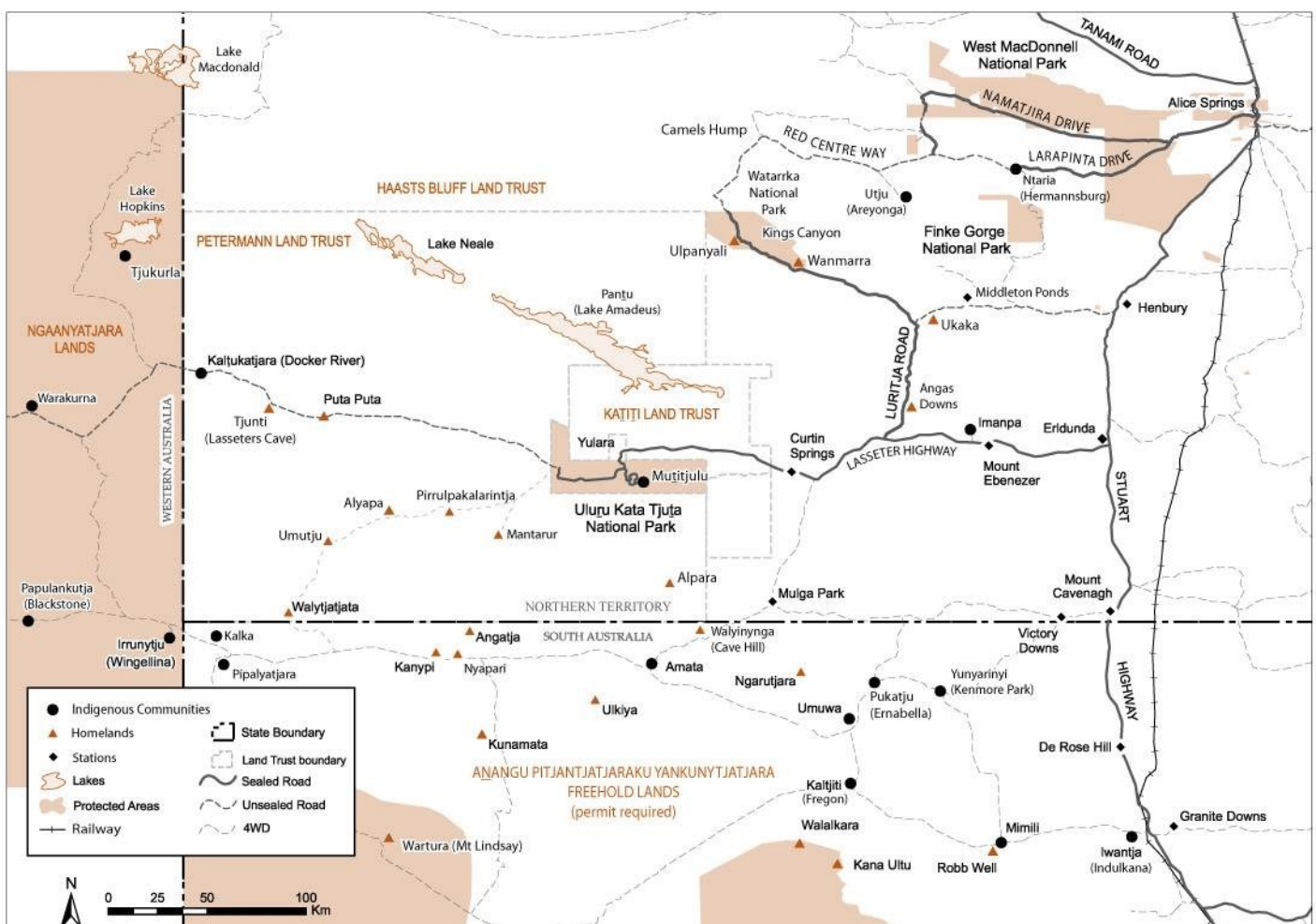
The park was proclaimed in 1977 under the *National Parks and Wildlife Conservation Act 1975* and continues as a Commonwealth reserve under the EPBC Act and has the following purposes:

- the preservation of the area in its natural condition; and
- the encouragement and regulation of the appropriate use, appreciation and enjoyment of the area by the public.

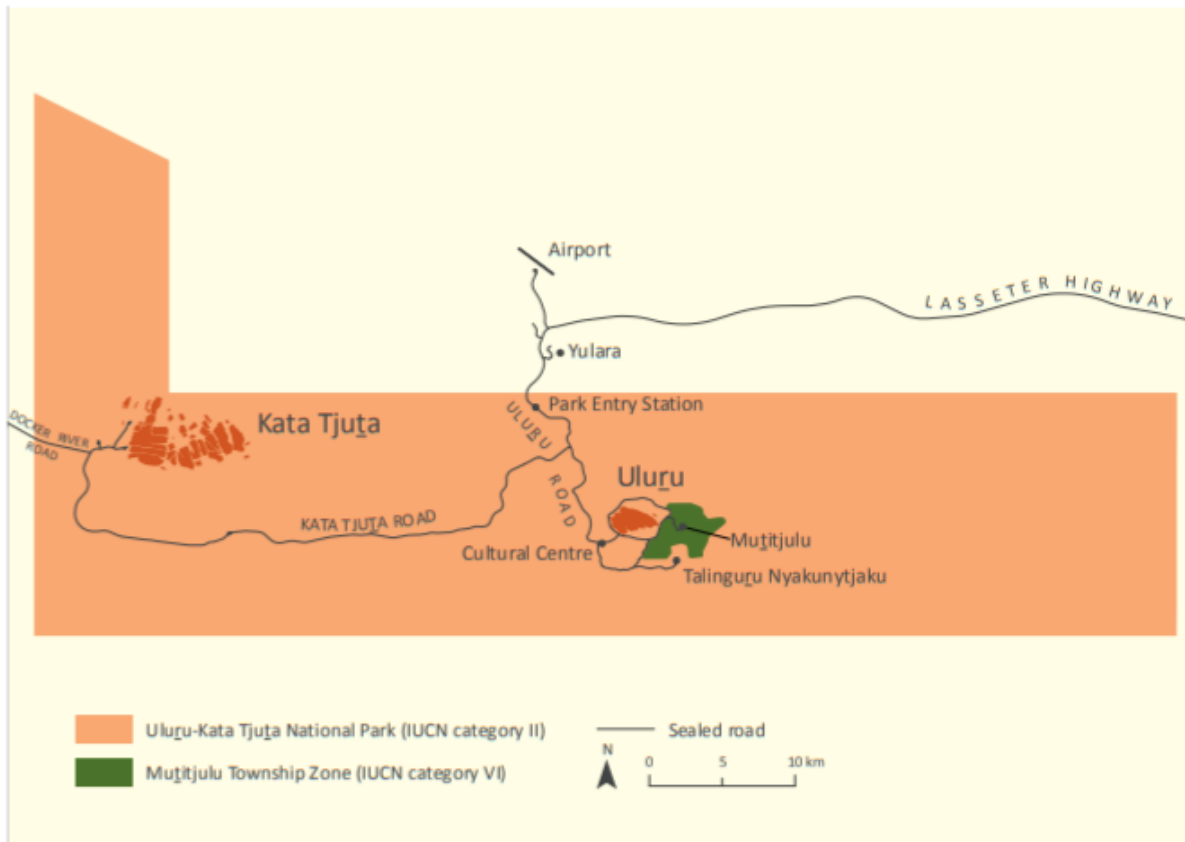
The park protects an area of approximately 1,325 square kilometres within the Great Sandy Desert bioregion.

Uluru-Kata Tjuta National Park is listed by the World Heritage Convention for its natural and cultural heritage attributes. The park meets four criteria for listing under the convention:

- An outstanding example representing significant ongoing geological processes, biological evolution and man's interaction with his natural environment
- Contains unique, rare or superlative natural phenomena, formations or features or areas of exceptional natural beauty, such as superlative examples of important ecosystems to man, natural features, sweeping vistas covered by natural vegetation and exceptional combinations of natural and cultural elements
- A cultural landscape representing the combined work of nature and of man, manifesting the interaction between humankind and its natural environment
- An associative landscape having powerful religious, artistic and cultural associations of the natural element



Map: Indigenous communities and homelands in the lands surrounding the park



Map: Zones and their IUCN categories within the national park

Management plans enable activities within Commonwealth reserves

The EPBC Regulations control, or allow the Director to control, a range of activities in Commonwealth reserves such as camping, use of vehicles and vessels, littering, commercial activities, commercial fishing, recreational fishing and research. The Director applies the Regulations subject to and in accordance with the EPBC Act and the park's management plan. Activities that are prohibited or restricted by the EPBC Act may be carried out if they are authorised by a permit issued by the Director and/or they are carried out in accordance with a management plan or if the activity is permitted or authorised under r.12.06 (1) of the Regulations.

Preparation of the management plan

The EPBC Act requires the park's Board of Management and the Director of National Parks to prepare a management plan for the park which takes into account the interests of traditional owners and any other Indigenous person interested in the park. Once the draft management plan has been prepared the Director must seek comments on the draft from the public, the Central Land Council and the Northern Territory Government before finalising the management plan and providing it to the Minister.

To initiate the preparation of this management plan, the Director reviewed how well the previous plan had been implemented so the Board could think about how to improve park management through this plan. A review in 2015 considered whether the Director had successfully carried out the

actions and policies in the previous plan, and whether the Director had successfully met the aims of each section of that plan.

The review's findings suggested potential improvements to aspects of park management, recommending to:

- plan, monitor and report more regularly to provide measures of progress;
- ensure Board resolutions are properly formulated, tracked, and reported on;
- improve opportunities which lead to direct employment of Anangu;
- review the status and intent of climate change strategies;
- address the impact of feral species on native wildlife; and
- address risks of ageing capital infrastructure, and ensure that park assets meet Australian standards.

These recommendations were taken into account in the preparation of this plan.

In September 2017 the Director published a notice inviting the public and stakeholders to have their say towards the preparation of this plan. Eleven written submissions were received, and the views expressed in those submissions were also considered in the preparation of this plan.

Preparation and discussion of the management plan occurred at most of the four Board meetings held each year from 2017 to 2019. Five Board Consultative Committee meetings and three Anangu consultation workshops were also held. These consultations involved more than 50 Anangu from Muṯitjulu and surrounding communities.

During the drafting stage of this plan, park staff also conducted extensive consultations with over 50 Anangu during participatory planning meetings, working group meetings and Board of Management meetings. These consultations focussed on park management issues related to decision-making and working together; cultural and natural resource management; visitor management; Anangu employment and the building of other benefits for Anangu.

Several other stakeholder groups and individuals were consulted during the preparation stage, including:

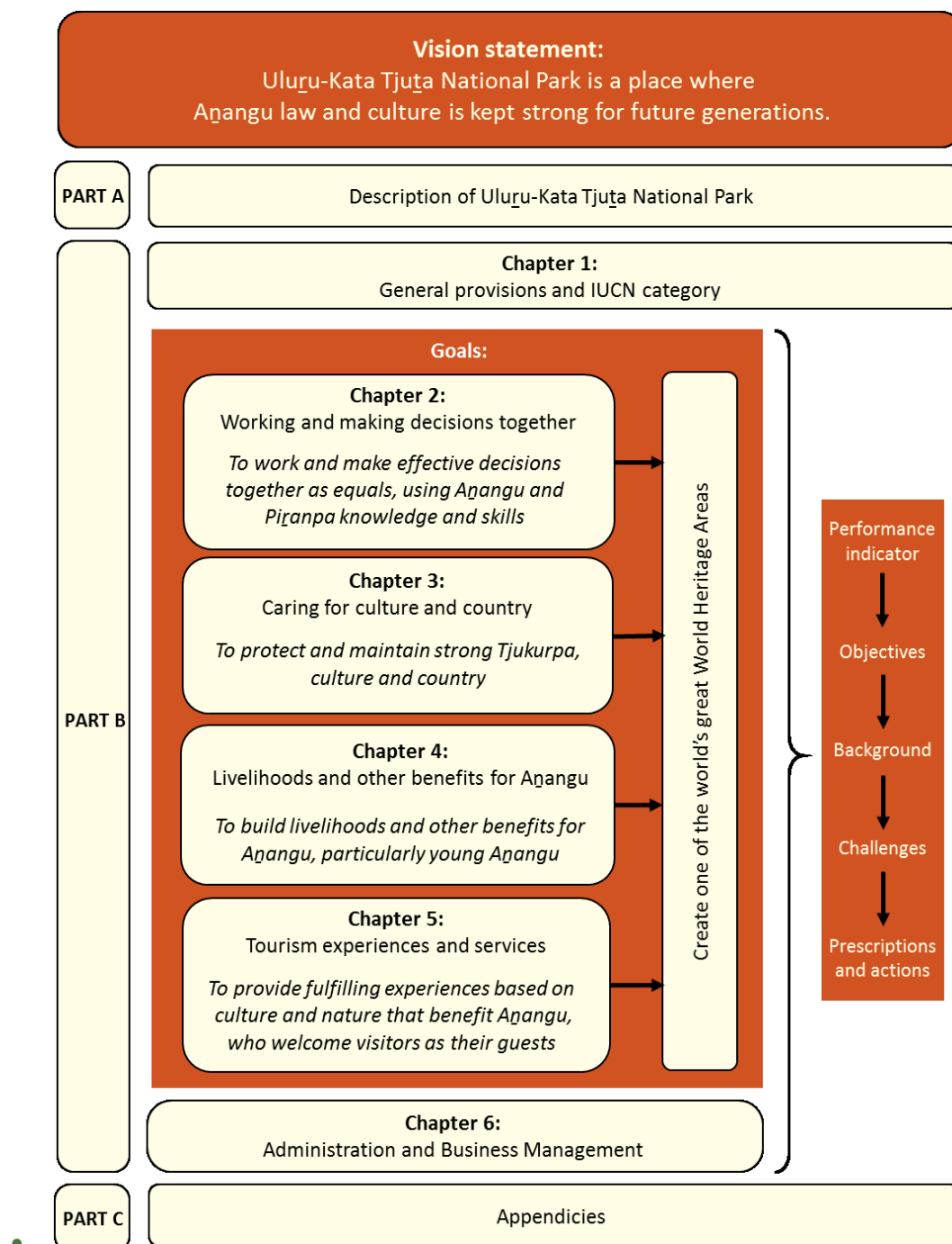
- Anangu residents of the Muṯitjulu community
- the Uluru-Kata Tjuta National Park Tourism Consultative Committee
- the Uluru-Kata Tjuta National Park Cultural Heritage and Scientific Consultative Committee
- the Central Land Council
- the Northern Territory Government
- government agencies (the Department of Prime Minister and Cabinet and the Executive Director of Township Leasing)
- local Aboriginal associations and corporations, including Anangu Jobs and the Muṯitjulu Community Aboriginal Corporation (MCAC)
- park staff.

The draft plan was released for public comment on 9 December 2019 and closed on 7 February 2020, allowing a longer period than the 30 days required under the EPBC Act.

Invitations to comment on the draft plan were published on the department's website, in the Australian Government Gazette and in The Australian and NT News newspapers. Copies of the draft plan were sent to stakeholders with an invitation to comment (including those who provided comments towards the preparation of the draft plan). Copies of the draft plan were also available from the park and from the department's website.

Thirteen written submissions were received from a range of stakeholders. The Board of Management met twice to discuss the comments on the draft plan and an additional out of session meeting was held with Anangu Board members to discuss the last outstanding issues and adjustments necessary to finalise the plan.

Structure of the new management plan



Summary of comments received on the draft plan

Of the written comments received in relation to the draft management plan, two concerned investment in park infrastructure and two with calls to reopen the climb - neither of these issues are addressed by changes to the management plan. A submission from Voyages Tourism was supportive of the focus on development and promotion of Anangu cultural experiences, protection of natural and cultural values, and Anangu participation and ownership in tourism.

All other comments received have been documented at **Appendix 1**, along with the Director of National Parks' response. Original submissions are at **Appendix 2**.

Next steps

In accordance with s370 of the *Environment Protection and Biodiversity Conservation Act 1999* the management plan must be given to the Minister for approval, together with any public comments received on the draft plan and the views of the Director on the public comments (this report).

Once the plan is approved, it is required to be registered on the Federal Register of Legislation (FRL) in accordance with the *Legislation Act 2003*. In the absence of a specified date of effect in the management plan, the plan will come into effect on the day after registration on the FRL.

After the plan is registered, it is tabled in Parliament. The plan is subject to consideration by both Houses and, in accordance with the EPBC Act, may be disallowed at this stage.

Summary

The attached plan has been prepared in accordance with the EPBC Act and takes into account the outcomes of consultation with the local community and stakeholders and two opportunities for the public to provide written comments towards the drafting of the plan.

The result is a strong management plan that will guide the conservation and management of this unique park for the next 10 years.

Jody Swirepik
Director of National Parks (a/g)
June 2021

Appendix A – Public comments received and response from the Director of National Parks

Section/ Page	Stakeholder main points & recommendations	Director of National Parks Response
<i>Skydive Uluru</i>		
5.1.2	1) It is understood by Skydive Uluru that the various representatives of the community are all in favour of having parachuting activities occur at the Sports Oval in Muṯitjulu. Please note the intention is only to have parachutes land at the community. There is no intention for aircraft to take-off from the community. 2) Having already consulted with representatives of the National Park, it has been established that the National Park believes that the rules of the National Park apply to the land leased by the Muṯitjulu Community. Having consulted representatives of the Muṯitjulu Community, I understand that this is inconsistent with their understanding. However, IF it is the case that the rules of the Park Management Plan do indeed apply to the land leased by the Muṯitjulu Community, THEN: 3) (I/we seek) The removal of the word 'parachuting' to allow the Muṯitjulu Community to pursue having parachute activities occur in the community. This would facilitate the stated 'Goals' of the Management Plan, specifically: • To build livelihoods and other benefits for Aṅangu, particularly young Aṅangu. One of the performance indicators listed in the Draft Management Plan is: • Whether more Aṅangu are indirectly employed or receive other benefits because of the park Muṯitjulu and Skydive Uluru have been seeking to provide 2 key opportunities for the Muṯitjulu Community: a) Opportunity for employment as a 'Ground Control Assistant' (GCA) for members of the community. It is a requirement that a person approved to be a GCA be present at the parachute landing area when parachute activities are occurring. b) Opportunity for financial input to the community via a 'parachute landing fee' to be paid when parachutes land at the community (Sports Oval). Please note that the Muṯitjulu Sports Oval has been inspected and approved for use as a parachute landing area by the Australian Parachute Federation.	<i>The Board has considered but did not choose to amend the management plan on this issue. The plan maintains the current settings.</i>

Section/ Page	Stakeholder main points & recommendations	Director of National Parks Response
	4) The possibility for realising any progress on this matter has been halted by the presence of the word 'parachuting' in the current (and now Draft) Management Plan. 5) Skydiving and Parachuting in Australia is a recognised Sport and Recreation under the Air Sport Australia Confederation. The governing body is the Australian Parachute Federation: https://www.sportaus.gov.au/australian_sports_directory?sq_content_src=%2BdXJsPWh0dHAIM0EIMkyIMkZtYXRyaXhzc2lmcmVwb3J0LmF1c3BvcnQuZ292LmF1JTJGb3JnYW5pc2F0aW9ucyUzRnBhZ2UIM0QxJTl2c29ydE9yZGVyJTNEbmFtZV9hc2MmYWxsPTE%3D Removal of the word 'parachuting' from the text. 5.1.2 The following activities are prohibited by the EPBC Regulations, and permits will not be issued to undertake them: a. climbing, abseiling on, or jumping from rock faces; b. bungee jumping and BASE jumping; c. hang-gliding, paragliding and hot air ballooning.	
Muġitjulu Community Aboriginal Corporation		
Part B - 1.3	States 'the fifth plan commenced on the 9 January 2010 and will cease on the 8 January 2020'. Should this be 'and will have ceased' as it will be past tense?	<i>Amendments made to the plan.</i>
Part B - 1.5.4	This is an important point for the Muġitjulu Community and MCAC and will aid in the sustainable development (social, economical and cultural) of the community, and the Muġitjulu Township Zone staying the management category VI is important from now on. Maintain category VI status.	<i>The ascribed category has been maintained at Category VI.</i>
Part B - Chapter 2 Para 1	Last words of first para states; 'and when planning and implementation park operations'. Should this be 'and when planning and implementing park operations'	<i>Amendments made to the plan.</i>
Part B - 2.1.13	How often and when will this plan (2020-2030) be reviewed/measured? What will be the consequences of the outcome of this review? How will poor performance be counteracted? Who will do the review?	<i>The plan includes a schedule for review, scheduling for prioritisation and implementation, and an audit for the Board in the fifth year (see Actions 2.1.1-2.1.3)</i>

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Part B - 4.1 - Para 6	Is there a realistic and achievable timeline for the Aboriginal administration, management and control of the Park?	<i>The Board have not chosen to use the management plan for this purpose.</i>
Part B - 4.1 - Para 8	“the making and selling of art’. This is an issue that has been raised many times, the selling of art in the Park needs to be more regulated for several reasons including the artists undervaluing themselves and paintings being sold for pittance. Regulate art sales to increase benefits and income for artists.	<i>This matter is a current issue for discussion and action for the Board, with resolutions approving a strategy and course of action using established mechanisms in the management plan.</i>
Part B - 4.1	‘Increasing social and economic benefits for Anangu’. How is it proposed that this will be achieved?	<i>This issue has been addressed in a number of broader initiatives, including recently in the development of new performance measures by Parks Australia.</i>
Part B - 4.1.9	Increase park generated revenue and therefore amounts paid to Anangu. Does this just refer to gate money collected?	<i>Allocation of revenue is determined in accordance with terms of the park lease and is not a matter for the management plan.</i>
Part B - 4.2.15	MCAC would request that we can organise commercial events such as markets or events for more than 15 people as a tourism venture or event if this is identified without getting a permit	<i>A more flexible arrangement can be found explored using the established commercial approval mechanism, following Board discussion.</i>
Part B - 5.2 - Para 8	Include Parks intent and commitment to upgrade and maintain the Cultural centre and provide those Anangu businesses with timely repairs and maintenance.	<i>Adequately addressed at Chapter 6.1. The Board is considering projects using new Government funding for infrastructure in the park.</i>
Appendix B Para 2	‘ininti’ – if the store is mentioned there should also be a mention of the Ininti café. Include café in explanation of the word	<i>Amendments made to the plan.</i>
<i>Law Council of Australia</i>		
Part B	Traditional owners express concern that cultural knowledge is still being lost, with social changes associated with living sedentary lifestyles impacting the transfer of knowledge to younger generations. The loss of this knowledge erodes the World Heritage cultural values of the park. The Committee directs attention to the need for inclusion of measures that will stop or reduce such loss.	<i>The Board addresses the importance of inter-generational knowledge at various points in the plan, with the key provisions in Chapter 3.</i>

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Part B	The Australian Environment and Planning Law Group (AEPLG) accepts the draft Management Plan's statement that Pitjantjatjara and Yankunytjatjara are two of the principal dialects spoken in the park, with these language groups extending throughout the central desert region. However, the Committee notes that other Aboriginal communities and dialects are present within the park area. The AEPLG seeks to clarify what consultation has been undertaken in relation to the draft Management Plan with all Aboriginal communities within the park area and at its boundaries, including those not directly involved in drafting the Management Plan, namely those outside Pitjantjatjara and Yankunytjatjara.	<i>Appendix G describes the five Board Consultative Committees meetings and Anangu consultation workshops held as part of the consultation process. These consultation involved more than 50 Anangu from Mutitjulu and surrounding communities.</i>
Part B	Tourism impacts on the park must be carefully monitored and managed, including but not limited to vandalism, dust accumulation on rock faces, rubbish, crowding and noise impacting sites and wildlife.	<i>Monitoring impact and visitor management are adequately enabled by the proposed provisions.</i>
Part B	Whilst the draft Management Plan introduces some areas for monitoring the effects of climate change, this will need careful and consistent monitoring into the future, as the true extent of such effects at this time are unknown.	<i>Monitoring of impacts on the natural and cultural values of the park are adequately enabled by the management plan. The particular impact of climate change will continue to be a focus of adaptive management.</i>
Northern Territory Government Department of Tourism, Sport and Culture		
p.iv	The vision and goals do not take into account the significance of tourism, nor consider the purpose of significant level of public funding being provided by the Australian Government, to also support all Australians (as visitors) and many Australian companies that rely on the park. Rework visions and goals to be more explicit about the way forward in terms of growth versus protection, ensuring the system of management supports both.	<i>The vision and goals are set at a high level, relating to what Anangu want to achieve, not necessarily how they will achieve it.</i>
Foreword p.v	Has the park had some discussion directly with key invested tourism operators in the area e.g. Voyages, AAT Kings?	<i>The tourism industry is represented on the Board of Management, and has significant input to the management plan.</i>
Foreword p.v	The Vision set out in the draft plan is exclusive of tourism. Welcoming visitors and wanting them to have a positive experience is referenced, but no comment about the operators that facilitate the experience. Future generations could be read as for Anangu only or generally. Include reference to tourism operators in the Vision and clarify meaning of reference to future generations.	<i>The Vision is the agreed vision of the Board and is based on broad and intensive discussion and consultation.</i>
Part A - p.2	Include discussion of UKTNP in relation to the wider region i.e. where is it located in relation to Alice	<i>This information is presented at Figure 2, and is perhaps more</i>

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	Springs and NT/WA/SA border; other communities etc. (i.e. distance to Alice, access along which roads and tracks).	<i>effectively approached in targeted interpretation material produced for particular audiences.</i>
Part A - p.3	Watarrka NP is a jointly managed park and close neighbour to UKTNP. The Plan would be strengthened by a discussion of the connectivity of Watarrka NP both culturally and as a visitor experience. Include a discussion of the connectivity of Watarrka NP both culturally and as a visitor experience.	<i>Institutional links are addressed in connection to the Kaṯiṯi Peterman IPA. A description of cultural connections and visitor experiences is perhaps more effectively approached in interpretation material produced for particular audiences.</i>
Part A - p.6	Tjukurpa is such a central part of the people, park and management, a visual description of it along with the text description on p.6 would reinforce this foundational traditional law. Include a visual example of <i>Tjukurpa</i>	<i>A visual and conceptual representation in this form is not something Anangu have used to describe 'Tjukurpa' to date - though of course many images have been created of particular instances of Tjukurpa.</i>
Part A - p.7, Para2, Point 9	Questioning the term private. Tourism NT has been in conversations with Muṯitjulu community members who have aspirations regarding tourism initiatives. Considering the 10 year life span of this plan, the option for new initiatives should perhaps be left open. Does MCAC agree with the idea of keeping Muṯitjulu private? Remove the word 'private'.	<i>A question for MCAC and not an issue raised by them (see MCAC comments and suggestions in this report).</i>
Part B - p.11	IUCN is not spelled out in full in its first use.	<i>The IUCN is an acronym in common use globally, and is spelled out in full in the glossary. Spelling it out at the first use is less useful in a large document such as this, where the first use may be difficult to locate quickly.</i>
Part B - 1.3 p.13	Department of Tourism, Sport and Culture; Parks, Wildlife and Heritage, and Tourism NT have significant expertise and corporate knowledge in planning, park operations and joint management in Central Australia and wider NT. Prior consultation with NTG agencies responsible for joint park management within the region could benefit UKTNP's planning process and operational synergies.	<i>A representative of the Northern Territory Government has been a member of the Board since its establishment and that position is mandated by the EPBC Act.</i>
Part B - Chapter 2- Snapshot p.24-25	Repetition of the information in the Chapter Snapshot diagrams and in the text directly following significantly lengthens the document and impacts readability. Incorporate the plain language descriptions in to the snapshot.	<i>The Board's preference is to have the snapshot included as a very brief reference to the convey complex information from the whole chapter, at a single point</i>
Part B - 2.1, Para 1 p.26	Reference made to Nguraṯitja on p.26 but not defined until p.29. Define term earlier in the plan.	<i>Nguraṯitja is defined on p.2 of the plan, under joint management.</i>
Part B - Chapter 2, Figure 7 p.28	Figure seems to say the Board want tourism in the Park to be owned by Anangu . Consider how that may be received by operators who have invested significantly to date.	<i>The figure is an example of discussions that occurred in preparation of the management plan.</i>

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Part B - 2.1.13 p.32	This action appears to indicate that there will only be one major audit of the plan over its 10 year life - at the end. What other major audits and reviews are planned?	<i>The management plan is a legislative instrument made for a 10 year period. Within that context, operational plans for the park are reviewed, developed and reported on annually, in accordance with the management plan and the EPBC Act, and with the Director of National Parks Corporate Plan and the PGPA Act.</i>
Part B - 2.1.13 p.32	Unclear how and when the performance indicators will be measured. The plan could be strengthened if the means to measure indicators in the plan are explained. Explain monitoring of performance indicators in Chapter 2.	<i>Performance indicators are established in the budget process and in corporate planning requirements of the PGPA Act. The management plan prescriptions and actions legally enable performance monitoring on the park.</i>
Part B - 2.1.13 p.32	Identify and include adaptive cycle to improve management.	<i>The management plan is a legislative instrument made for a 10 year period. Within that context, operational plans for the park are reviewed, developed and reported on annually, in accordance with the management plan and the EPBC Act, and with the Director of National Parks Corporate Plan and the PGPA Act.</i>
Part B - Chapter 2, Table 2 2.1.3(d) p.32	Example 3 - Seasonal opening and closing of visitor areas. Is this a set date or time period? This communication is critical for tourism operators to function effectively.	<i>The table makes clear that with this example, consultation with stakeholders, including of course tourism operators and peak bodies, is required.</i>
Part B - Chapter 2, Table 2 2.1.3(d) p.32	Decision making process, point 2 - In the context of routine actions is this language correct? As it is routine should it be discussed, or is the level of consultation more significant than expected? This is a consideration for tourism due to extensive timelines often required for comprehensive consultation.	<i>The table, along with the impact assessment Table 3 indicates a more comprehensive consultation should occur with non-routine actions.</i>
Part B - Chapter 3, Para 3 p.38	The current language in this para positions tourism as a threat and a negative, rather than as a positive supporting the natural and cultural values if worked in partnership with and effectively managed.	<i>The point of the sentence is to note relatively recent changes to the landscape – which are described in a neutral way – which does indeed include tourism and its related infrastructure.</i>
Part B - Chapter 3, Snapshot 3.3 p.38	Consider changing to passive voice. Change text to 'Carefully consider the likely impacts of proposed actions on park values and Nguraitja interests before approval proposals'.	<i>Amendments made to the plan.</i>
Part B	There is discussion in Chapter 3 about cooperating with regional neighbours that could be included	<i>Both sections are in fact in Chapter 3 and quite close together.</i>

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p.39	in this section.	<i>The improvement is not clear.</i>
Part B - Chapter 3, Feature Box 2	Para 3 (about Tjukurpa) reads as if it is the Anangu and other Aboriginal people misusing Indigenous cultural and intellectual property.	<i>Tjukurpa governs access and use by Anangu and other Aboriginal people. The issue raised here is that ICIP can now be accessed by non-Aboriginal people, and this is the issue the management plan should address.</i>
Part B - 3.1 p.41	Needs to be a recognition that appropriate access to ICIP (photographs, films and artworks) is essential in marketing the park and there needs to be a process where tourism organisations and operators can easily access approved images for marketing and promotional activity in the park.	<i>These matters are regulated by the Film and Photography Subcommittee of the Board, which includes the Board member nominated by the Tourism Industry. There is a well-established and practical process for appropriate access.</i>
Part B - 3.1 p.41	Anangu benefiting from sharing ICIP - the benefit will come from gate takings of visitors attracted through the use of these images.	<i>The use of images in marketing is only one use of ICIP from which Anangu benefit, and less direct than others – for example, direct sale of art at the Cultural Centre and commercial use of copyright.</i>
Part B - Chapter 3, figure 10	Protected areas identified don't reflect homelands surrounding UKTNP, or other jointly managed parks in the area.	<i>The intention of the figure is to represent the location of homelands and communities in relation to the park.</i>
Part B - 3.1, p.44	It may be of benefit to have a tourism representative on the Cultural and Natural Heritage working group. Publicising appropriate heritage contributes improved awareness, understanding and value of Anangu history and culture.	<i>The working group has been established by the Board, which includes a representative nominated by the Tourism industry, with a specific mandate and personnel in relation to conservation and protection of natural and cultural values. Other working groups and sections of the management plan deal directly with tourism and tourism expertise.</i>
Part B - 3.1 , p.44	Will the keeping place constructed at the park be open to the public and if so, will culturally appropriate items be displayed?	<i>A secure keeping place is designed to keep culturally important items safely beyond the public domain and under appropriate cultural supervision.</i>
Part B - 3.1.11	Dot points don't include tourism in the programs and activities. This could offer Anangu youth another career pathway.	<i>The dot points are the intended goals of programs and activities, not a list of the means to achieve them.</i>
Part B - 3.2 p.50	Rene Kulitja quote could also state how this knowledge is important for all Australians. Change to 'this is important for the plan, the park, for intergenerational transfer to young Anangu and for Australia.'	<i>The Director of National Parks does not support changing a quotation.</i>
Part B - 3.2 - Para 3 p.55	Typo - minimise the spread of wildfires, and in reduced the...' Should read 'and in turn reduce the...'	<i>Amendments made to the plan.</i>

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Part B - 3.2 p.56	Climate change is likely to impact the ability of visitors to access experiences for more of the year (e.g. due to extreme heat events). Suggest inclusion of a comment addressing the likelihood of climate change impacts to visitation and visitor needs and Actions to be taken to address issues such as cooling zones, different activities including to re-timing activities to the early morning, planting for shade, infrastructure design, and material selection.	<i>This section is about the natural and cultural values of the park, rather than visitor's experience of those values. Infrastructure planning is regularly discussed by the Board, and the type of actions proposed can already be considered under the existing provisions.</i>
Part B - 3.2.2 p.56	What level of consultation with tourism reps will be afforded before the Director restricts or prohibits access...?	<i>The level of consultation is set out in Tables 2 and 3, and Sections 2.1 and 3.3.</i>
Part B - 3.2.4 p.56	Can the police take police dogs in to the park? Identify legislation and include relevant info	<i>Taking dogs into the park is an offence under Div 12 of the EPBC Regulations, but the EPBC Regs also provide that it is not an offence for NT Police to take police dogs into the park for law enforcement and search and rescue operations. The management plan prescriptions do not need to restate existing law.</i>
Part B - 3.2.7 p.57	Does the allowance for introduction of gravel for road maintenance or construction without a permit affect weed prevention?	<i>Road maintenance and construction works must still be authorised by the Director under the management plan, with conditions that deal with mitigating risk of weed incursion.</i>
Part B - 3.2.12, f. p.57	Having this as a key action takes away a focus on self-determination and perpetuates negative stereotypes. Suggest the action focus on the cultural knowledge preservation, or monetising/generating wealth within the region, as the goal (it is understood that seeking funding would be part of the strategy).	<i>The Board included this action as they consider it a priority for the Director to assist Anangu preserve and protect cultural knowledge by seeking additional funding from other sources for this purpose.</i>
Part B - 3.2.14 p.58	This action talk about a coordinated approach to cultural and natural management across tenures, particularly working with IPA managers. Opportunity to mention that there could be a coordinated approach with DTSC, Parks, Wildlife and Heritage Division, particularly regards with Watarrka National Park.	<i>The priority here is with protected area managers sharing boundaries with the park, but current wording allows for coordination and cooperation with Watarrka – indeed, there already exists a level of exchange including of staff and training.</i>
Part B - 3.2.16 e. p.58	Public education' conservation programs could be included as a conservation measure. Suggest additional point (g.). Could be run as a free or paid program, on site or online.	<i>Covered in Chapter 5</i>
Part B - 3.2.28 h.	Coordinating fire management activities at the regional level with neighbours and stakeholders such as the CLC and Bushfires NT.	<i>To the extent that stakeholders are neighbours and relevant to fire management, the proposed wording does include fire</i>

Section/ Page	Stakeholder main points & recommendations	Director of National Parks Response
p.59	The Plan could include mention of a coordinated approach to fire management with DTSC Park, Wildlife and Heritage Division and the IPA. Also extends to 3.2.15 (cultural management).	<i>managers in the region. The wording also recognises the relative levels of formality and legal obligation in those relationships.</i>
Part B - 3.3 p.60	Language in the para positions tourism as having negative impacts. Rephrase to '...potential positive and negative impacts' / '...and visitor safety and satisfaction'.	<i>Consistent with impact assessment policy under the EPBC Act and generally, only adverse impacts are relevant when considering the approval of proposed actions in this section of the management plan.</i>
Part B - 3.3.4 p.60	Table 2 doesn't explain how consultation will be carried out, rather a duplicate statement about consulting with Ngurarritja. Clarity on the consultation process within each action category would be of benefit.	<i>The nature and manner of consultation with Ngurarritja is properly a matter for the Central Land Council to determine.</i>
Part B - 3.3 Table 5 p.65	Reads more like a risk management plan, as it does not capture positive impacts more broadly. The Park is a key tourism driver to the NT and Australia, which in turn supports further opportunities for the Yulara region and further contributes indirectly to Anangu . These broader benefits are not made clear through this (negative) impact assessment.	<i>Consistent with impact assessment policy under the EPBC Act and general impact assessment practice, only adverse impacts are relevant when considering the approval of proposed actions in this section of the management plan. Benefits of actions can be considered by the Board and the Director separately from the impact assessment.</i>
Part B - p.68 Para 1	Current language disempowers Anangu . Should change to '... support Anangu to build livelihoods and generate benefits through...'	<i>Amendments made to the plan.</i>
Part B - p.68 Para 2	Unclear on the who and how regarding the security of land tenure.	<i>The text is clear. Unsure what else is needed.</i>
Part B - Chapter 4 p.68	Discussion of indirect employment of Anangu , clarify whether this includes Yulara. Important to be clear on what is indirect employment and benefits	<i>The intention of the snapshot is a concise picture -more specific avenues for generating financial benefits are addressed later in chapter and in the new park performance criteria.</i>
Part B - Chapter 4 p.68	Would be good to break the indicator down to see the benefits (or not) of direct employment in order for Anangu to make informed impact assessment and decisions. Also connects to Tourism Industry Strategy 2030 and can assist DTSC's business case to request additional funding to support the development of Aboriginal cultural tourism experiences.	<i>These are high-level indicators that reflect how the Park achieves its aims – these are indeed broken down in annual operational and strategic planning.</i>
Part B - Chapter 4 p.68	Suggested addition of indicator Suggestion: 'How many new opportunities for Anangu are created by new commercial business within Yulara region'	<i>Already covered under the third indicator, noting that management plan indicators are necessarily high level, with detailed and adaptive indicators developed within the annual planning, operational and reporting cycle..</i>
Part B - 4.1 p.69-71	Although Draft Management Plan is clear about ensuring benefits for Anangu , it does not articulate what Anangu themselves are responsible for or empowered to do. Clarity on this will dictate what other agencies are expected to bring to the table.	<i>The management plan establishes the legal framework for the Director of National Parks, not for Anangu.</i>

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Part B - 4.1 p.69-71	The importance of selling artefacts to tourists is mentioned, however the link between this and facilitating tourism has not been sufficiently made. No commercial enterprise is referenced, only jobs.	<i>Chapter 5 discusses tourism specifically. It should be noted that the Director of National Parks enables rather than controls commercial enterprises, and that unnecessary detail on particular enterprises may unwittingly constrain flexibility during the life of the plan.</i>
Part B - 4.1 p.69-71	The plan identifies what Anangu want for their youth. Suggest including how youth have been engaged, what their aspirations and interest are in this space?	<i>Descriptions of Anangu aspirations have emerged through the consultation process for developing the management plan, and have been included on that basis.</i>
Part B - 4.1 p.70	These don't read as challenges. Generalising tourism in point two makes it appears that tourism is the barrier to increasing the benefits for Anangu - is this correct? Identify the actual barriers/challenges or the plan will not be as actionable/results will suffer. Identify challenges within each point.	<i>Don't agree with that reading, these are the challenges that face the Director as a joint management partner and leasee of the park.</i>
Part B - 4.1 p.70	Does use of native flora and fauna in this allow for the potential farming of these native products within the region (not within the park but on traditional lands?)	<i>No, the management plan does not manage land outside the park</i>
Part B - 4.1 p.70	In the interest of sustainability, how is 'small scale and low impact' defined and regulated?	<i>The legal meaning of the phrase is to be determined from the management plan itself, including context.</i>
Part B - 4.1.3 p.71	What document will guide the working group other than the list of actions here? A strategy for Aboriginal employment and engagement with specific time frames, targets and responsible officers is needed. Recommend the strategy be updated every 3-5 years.	<i>These are questions to be covered by the working group and its Terms of Reference, which will be discussed, consulted on and established by the Board.</i>
Part B - 4.1.7 p.71	Suggest including something about ongoing training to equip Anangu on how to work in the tourism industry	<i>'Training opportunities' added to the text.</i>
Part B - 4.2 p.75	Point 8 perpetuates an idea of expected support rather than self-determination, self-governance and management. Changing this focus/language does not take away the current need for the funding or the funding itself but is strengthens the message of Anangu control over their livelihoods and way of life.	<i>MCAC is a not-for-profit organisation, that runs largely on grants. The line is included as specified by MCAC's identified objectives. It is a central function of MCAC and should remain in the plan.</i>
Part B - 4.2 p.76	Clarify point 3 to identify the impact mitigation as relating to negative impacts only. Suggested: '...development of Muṯitjulu community is sustainable and doesn't negatively impact...'	<i>Consistent with use of the term 'impact' throughout, reflecting standard use in impact assessment.</i>
Part B -	Unclear who is to meet with MCAC, is an NT Gov representative involved and what constitutes	<i>The Director of National Parks is to meet with MCAC. 'Action' in</i>

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4.2.18 p.78	regular?	<i>the management plan are actions for the Director, as the management plan is an elaboration of the Director's functions and powers.</i>
Part B - 4.2.18 p.78	Suggest an action be included that heads towards economic self-determination	<i>This would be an aspiration for MCAC rather than the Director, and not something the Director can ultimately be responsible for.</i>
Part B – Tourism experiences and services Para 1 p.80	Agree that Aṇangu should benefit from their land, however it is very passive language around Aṇangu self-determination and input, particularly considering the 10 year timeframe of this plan	<i>This statement comes from consultation and joint management, and describes the fundamental Aṇangu understanding of how the park should be –expectation of benefit and generosity of sharing the park with visitors.</i>
Part B – Tourism experiences and services Snapshot p.80	An additional KPI should be the number of visitors to the park. Suggest adding a KPI. Number of visitor activities in the park KPI could be rephrased to pick up on new experiences but also monitor the loss of existing activities and experiences which is equally important. Suggested: 'the number of visitor activities and experiences there are in the park' KPI 6 - how will this be measured? How will Parks determine what everyone who visits puts on social media or takes photos of? What legal rights do Parks have to control what individuals put on social media? Another worthwhile KPI might be the number of commercial tour operator licenses/permits issued in the park. If this starts dropping, as is the case in Kakadu, it is an indicator of something wrong in the industry. Objective 5.4 - Agree on the need for commercial tourism operators to provide a range of fulfilling, sustainable, culturally appropriate... etc' however broadening the scope of responsibility for the delivery of these experiences as delivery is highly likely to also rely on other external factors within the powers and scope of other key stakeholders of this Draft Management Plan.	<i>The suggestions are welcomed as useful indicators within the annual budget, planning and reporting cycle – indeed, the sort of indicators that are monitored and reported on as part of ordinary business.</i> <i>The list of indicators in the management plan however represent the interests and perspectives not of the tourism industry, but of the ability of the park to provide the kind of experiences that Aṇangu want for visitors, the benefits Aṇangu expect to receive, the welcome and concern for visitors that Aṇangu want the park to offer, and the areas of concern for Aṇangu in welcoming visitors – for example, use of images on social media. The objective is not to control social media use, but to see that visitors are understanding the park in the right way.</i>
Part B - 5.1 Aṇangu traditional owner quote p.81	Quote doesn't fit the location. From a tourism perspective, we'd say get the experiences right and tourism will follow i.e. it is more about the substance (the product and infrastructure than can deliver the story to the visitor) just having the cultural story behind Uluru .	<i>The Board is saying that their priority is that the story comes first. For the product to be right, the story must be right, and the story is the Board's primary concern.</i>
Part B - 5.1	The plan could be strengthened by giving a brief snapshot of what a visitor might experience when they come to the park.	<i>The UKTNP website, visitor experience plans and other marketing documents are more appropriate vehicles for this</i>

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p.81		<i>than the management plan, which is a legislative instrument.</i>
Part B - 5.1 p.82 paras 5-6	Closures and restrictions for cultural and safety reasons are understood and necessary, however they significantly impact operators and visitor access. What kind of notice is provided to industry and visitors when these closures are enacted? A minimum notice period to commercial operators of closures needs to be in a prescription in the plan in order to provide continuity and security of commercial activity and visitor satisfaction in the park.	<i>Visitor safety and cultural practices are important to the DNP, and commercial operators effected by closures are informed as soon as possible by Parks staff. This is standard practice, and is flexible and adaptive to changing seasons and circumstances.</i>
Part B - Section 5.1 Para 5 p.82	It is also noted in para 5 that there are places in the park where visitors are never allowed. The Muṭitjulu Community is included here. Tourism NT has been in conversations with Muṭitjulu community members who have aspirations regarding tourism initiatives. Considering the 10 year life span of this plan, the option for new initiatives should perhaps be left open. Amend prescriptions to allow for tourism initiatives to be developed in Muṭitjulu.	<i>The management plan does allow for commercial tourism activities to be carried out in Muṭitjulu by Anangu businesses under section 4.2.8.</i> <i>The management plan gives the Director the power to restrict or prohibit access, and notes some areas where this power has been exercised - but itself does not specify which areas shall or shall not be open for tourism.</i> <i>The Director will continue to work with MCAC on issues affecting Muṭitjulu.</i>
Part B - 5.1 p.82	The Plan could benefit from discussion about the wider tourism experience available to visitors in the region. Mentioned UKTNP as part of the Red Centre Way, linking Alice Springs, Tjoritja, Watarrka and Finke National Parks.	<i>While UKTNP is part of this broader network, the primary concern of the Board is with the visitor experience on the park.</i>
Part B - 5.1 p.82	Important to acknowledge the park as a key driver of tourism in the Red Centre and the Draft Management Plan contributes to improved sustainability of the park and region, particularly the works to ensure economic sustainability and stability in the region, of Anangu and more broadly.	<i>Agree, and regard the whole plan as doing this.</i>
Part B - p.82 para 2	Address Anangu wishes' is broad for operators. Alter to 'aligns with Anangu objectives'.	<i>The sentence here calls for the park, not operators, to address Anangu wishes.</i>
Part B - p.82 para 2	Suggest inclusion of current operators/improvements to product quality in the Boards continued focus. Alter to 'Therefore, the Board will continue to work with the tourism industry to facilitate the development of new <u>and existing</u> visitor experiences'	<i>Amendments made to the plan.</i>
Part B -	dot point s- The parks approach to tourism could be clearer e.g. Authentic experiences could be	<i>This section sketches the range of considerations in the park's</i>

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p.82 para 3	'authentic cultural experiences' as that is what the description details alter to '...including:' (suggested amendments are underlined) • <u>product</u> diversity and <u>quality</u> • authentic <u>cultural</u> experiences • events and festivals • niche markets • international <u>target markets</u> • <u>consumer expectations - the changing needs and expectations of consumers within different target markets and understanding how the park is viewed in a national and international context</u> • <u>access and connectivity - physical connectivity within the park and of the park to the broader region, and the park's importance within the region and wider Territory.</u>	<i>approach to tourism rather than establishing a prescriptive list – leaving space in the 10 year life of the plan for adaptive and flexible approaches.</i> <i>Some amendments made to the plan.</i>
Part B - p.82, para 4	What is meant by 'actively managing visitor use of site'?	<i>Measures such as closures, limitations on numbers and booking systems are noted in the following prescriptions.</i>
Part B - p.82.4	Typo - '... visitor use of sites to address of high numbers' - remove second 'of'	<i>Amendment made to the plan.</i>
Part B - 5.1 p.83	Don't read as challenges but as day to day management of the park. Would be clearer if the key challenges faced in maintaining road infrastructure or world class visitor experiences were detailed.	<i>The day to day management of the park is indeed the challenge. The intention here is to describe that challenge in a practical way, rather than in an aspirational or hopeful sense of the word.</i>
Part B - 5.1.1, b. – p.83	Having Anangu guiding development is key; in the spirit of working together however, it feels pertinent to include a comment on an understanding of commercial business constraints. E.g. 'Anangu guide the type, level and pace of tourism developments, with respect for the economic viability of the development entity.	<i>Unclear how Anangu could compel investment into an unviable proposal.</i>
Part B - 5.1.16 and 5.1.17 p.84	Prescriptions appear to be a duplicate.	<i>Amendments made in the plan.</i>
Part B - 5.1.10 p.84	Assume the tourism working group is the Tourism Consultative Committee. Recommend using consistent title for this group.	<i>'Working group' is the consistent terminology preferred by the Board for all such groups throughout the plan, to avoid confusion should the current name be changed in the next 10 years.</i>
Part B - 5.1.11, e. p.84	Mentions developing tourism experiences in ways that are cost effective. What does cost effective mean in this context?	<i>Simply that the product is effective in relation to its cost - i.e. good value for money.</i>
Part B -	Making sure <u>we</u> provide' only found one other use of 'we' in reference to the collective apart from	<i>Amendment made to the plan.</i>

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5.2 p.86	in this chapter. Important to clarify who is responsible for providing the service. Also on p.90. Change 'we' for 'the Park.	
Part B - 5.2.1 p.86	Add additional point to the themes in section 5.2.1 that are to be central to the Director's presentation and marketing of the park. f. visitors enjoy the park in a positive and culturally sensitive way.	<i>The suggestion is more of a goal or objective than a guide to presentation and marketing.</i>
Part B - 5.2.2 p.86	Important to ensure that in including this action, the idea of a brand is understood. A brand is a delivery promise to your customer, not just a logo.	<i>Understood.</i>
Part B - 5.3.5 p.88	It is critical to make this process easy and clear from the beginning to ensure materials, time and money are not wasted in error? Mutual respect and understanding is required. How will this be monitored and is this actually practical?	<i>This is properly a part of the authorisation process, whether permit, lease or licence. However, the management plan does not need to extend to the detail of these processes which in any case tend to evolve and improve over time.</i>
Part B - 5.3.11 p.88	This action encompasses two separate ideas. For clarity and to give these areas the required attention reformatting is recommended. Alter to: • 5.3.11 Promote and encourage pre-visit sales of park passes, products and services and onward journeying within the Territory. • 5.3.12 Enhance the visitor experience and encourage post-visit sharing on social media.	<i>Combining the two actions encourages a holistic approach to visitor experiences (one that begins before they arrive and ends well after they have left the park).</i>
Part B - 5.4, para 4 p.89	The objective and background is a positive set of aims. More information about what Parks and Anangu are committed to doing to achieve this is needed.	<i>Addressed later in the para and the next para down.</i>
Part B - 5.4 p.89	As articulated in the NT's Tourism Strategy 2030, the tourism industry welcomes opportunities to work together with local Aboriginal people to develop cultural tourism products and activities. However, the partnership expectation and responsibilities, processes and commitments could use more defining. This Draft Management Plan could address part of that current gap.	<i>This management plan is not the Board's preferred vehicle to address any gaps in the NT's Tourism Strategy.</i>
Part B - 5.4, para 7 p. 90	Appreciate the addition and sentiment of this section, however it does not provide a functional level of security or clarity around communications time frames and methods.	<i>Communication time frames and methods will vary dependent on the reason for closure, restriction or changes of access and cannot be addressed in the plan. It is an operational matter.</i>
Part B - 5.4 p.90	As has been noted, does not read as challenges but a blanket statement of the core job required.	<i>The core job is indeed the challenge the Board wishes to meet. The intention here is to describe that challenge in a practical way, rather than in an aspirational or hopeful sense of the word.</i>
Part B -	Point 2. This is a complex and unclear point. Increased visitation and maintaining values are not	<i>The challenge is in balancing the various elements and</i>

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5.4 p.90	mutually exclusive (as seems to be suggested) Alter to 'Balancing the importance of the park for commercial tourism and need to develop new commercial tourism opportunities, with environmental and cultural priorities'.	<i>objectives. There is no suggestion that they are mutually exclusive, hence the word 'balancing'. The proposed amendment also deletes the visitor experience and education from the challenge, which is a key objective of the Board.</i>
Part B - 5.4 p.90	Point 3. Articulates working with Ayers Rock Resort to make sure commercial tourism in the park is sustainable. Understand that they are the major tourism operator in the region, it is important that competition is not stifled.	<i>The tourism industry is already included in this point, which encompasses potential competition.</i>
Part B - 5.4 p.90	Point 4. 'Enough time for any changes that might affect their tour operations'. More detail on what is considered 'enough time' to provide security and stability for operators.	<i>Again, 'enough' could vary greatly dependent on the change in question. The Board has amended the plan to indicate an 18 month advance notification for major changes.</i>
Part B - 5.4.7 p.91	How/when would reserved classes of commercial activity be articulated and implemented? More detail required. It would be detrimental to have current or new tourism operators unknowingly set up one of the classes of commercial activities only to have the authorisation revoked.	<i>The comment is in relation to a prescription directed to the Director that allows the Board to decide that the Director may only issue new approvals for certain activities to Anangu only. It is not an action. The prescription does not allow for the Director, or the Board, to revoke existing authorisations.</i>
Part B - 5.4.14 and 5.4.15 p.91	A more specific indication of what regular is in this context would be appreciated. These two action items directly impact current and future operators; financial and regarding scheduling in order to be able to participate in knowledge sharing opportunities.	<i>Timing will depend on many things, and a schedule for 10 years covering all options is not realistic – it is expected that the tourism working group will continue to advise on the nature and frequency of such events, according to need and interest in the industry.</i>
Part B - 5.4.18 p.91	See previous comments about providing information to operators as soon as possible of changes to access, visitor management arrangements etc.	<i>See previous response</i>
Part B - 6 - Para 2 p.94	Typo - 'This chapter summaries these ...' Should be 'summarises'	<i>Amendments made to the plan.</i>
Part B - 6 Snapshot - Performance indicators p.94-95	How/how often will the indicators be measured?	<i>The differences in type of indicator will result in great variation to how and how often they are measured. Performance reporting is addressed under relevant legislative standards, particularly the Public Governance, Performance and Accountability Act 2013.</i>
Part B - 6.1	As this is a 10 year plan it was expected that there would be reference to more modern telecommunications infrastructure (i.e. WIFI and 5G connectivity) including for Mutitjulu	<i>The management plan is technology neutral, but provides the mechanisms for decision making to enable uptake of</i>

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p.95		<i>contemporary technological opportunities throughout its 10 year life.</i>
Part B - 6.1 Para 4 p.95	Typos - 'houses park plant materials'	<i>'Plant' is indeed the correct word to use here. Some amendment made to the plan.</i>
Part B - General comment	Throughout document, commas are not used to break up some longer, complex sentences. This negatively impacts comprehension.	<i>The example given is from a prescription and uses legal drafting and standards. As a legislative instrument, the management plan must be legally precise.</i>
Part B - 6.3 Para 9 p.99	Typo - 'in the future there may also a need to be prepared' Alter to 'in the future, there may also be a need to be prepared...'	<i>Amendment made to the plan.</i>
Part B - 6.4 Para 5 p.101	Need to clarify the law that applies in any case where the NT laws are found to be inconsistent with the park management plan.	<i>Amendment made to the plan.</i>
Part B - 6.4 p.101	Same as above comments, does not read as challenges but as job descriptions.	<i>See previous The management plan is indeed intended to enable the Director to do the job required. That is the challenge it addresses.</i>
Part B - 6.5 p.102	Point 1 - request the addition of 'including current commercial operations' at the end so as to consider and minimise negative effects on current operations. Add 'including current commercial operations'.	<i>There are many forms of sublease, licence and associated occupancy issues, and singling one out risks misunderstanding. The Board prefers to be clear that all arrangements are covered without exception.</i>
Part B - 6.6 p.103	Comment again on the wording of the challenges. 'Allowing' is a strange term to use here, currently reads as if making the decision itself is the challenge.	<i>It is indeed a challenge to make legally robust, flexible and adaptive decisions in sometimes unprecedented circumstances and that arise from time to time, with new technology, new understanding, new science.</i>
Central Land Council		
General comment -	This is a management plan not a tourism brochure. Replace dated "tourism" images with quality new "park" images of Anangu and Piranpa rangers working together on country, engaging with youth and tourists.	<i>The Board endorsed the draft plan inclusive of notes and images.</i>
General comment	Anangu planning notes Anangu should be given the chance to finesse their draft ideas in a painting or schematic	<i>Several attempts were made to commission artwork, however COVID restrictions and interstate artists have stalled this process indefinitely. The Board did endorse the draft plan</i>

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		<i>inclusive of notes and images</i>
General comment -	Snapshot of Chapters Swap order of “Objectives” and “Performance Indicators”	<i>This order emerged from extensive workshops, and was present throughout the process and in each draft that went to the Board.</i>
General comment	Use of the word 'traditional' could be rephrased to avoid connotations of a timeless and unchanging culture.	<i>The superfluous use of ‘traditional’ has been rationalised throughout the document.,</i>
Part A - p.v, Last para	The Board has outlined four key actions that will help to achieve this management plans vision and goals. Replace with 'The board will apply adaptive management principals by...'	<i>Amendment made to the plan.</i>
Part A - p.2 para 3	Joint management of the park between/by Nguraritja and the Director.... Replace 'between' with 'by'	<i>Amendment made to the plan.</i>
Part A - p.3, last para	Uluṛu-Kata Tjuṛa National Park and the Kaṯiṯi-Petermann IPA form part of a series of contiguous protected areas that cross the Northern Territory... Replace “contiguous” with “connected”	<i>The intent of ‘contiguous’ is to describe the geographical proximity of neighbouring protected areas, where ‘connected’ is a much broader concept.</i>
Part A - p.4, last para	The ALRA (and role of the CLC) should be mentioned here. A diagram explaining the tenure, lease and EPBCA would be helpful.	<i>The text has been amended with respect to the ALRA and role of the CLC, but it proved difficult to design a helpful diagram.</i>
Part A - p.5, map	Location of protected areas and reserves surrounding the Park Update map to include proposed Haast Bluff ALT IPA (recently announced by Minister).	<i>Understand that this IPA has not yet been established, though its feasibility report is being undertaken.</i>
Part A - p.6, first para	Uwankara Tjukurpatjara: Nguraritja winki, puṇu tjuṛa, ukiri, karu, tali munu puḷi tjuṛa uwankara winkiṯu Tjukurpa kanyini. Tjukurpa includes everything: the trees; grasses; landforms; hills; rocks and all. (Sammy Wilson) The word “kanyini” means “caring”, so translation should read “Tjukurpa includes everything: caring for the trees; grasses; landforms; hills; rocks and all.” Please check with Anangu	<i>All translations have been rechecked.</i>
Part A - p.6, second para	For further more information about Tjukurpa, see Feature Box 1. “Feature box” is an odd term. It could be replaced with a picture or a schematic of concentric circles.	<i>Feature box is a design element meant to draw attention to something.</i>
Part A - p.6, last para	Within the bounds of appropriate access to cultural knowledge, Tjukurpa is the source of much of the information for the interpretation of the park... Within the bounds of appropriate access to cultural knowledge, Tjukurpa is the source of much of the information for the interpretation of the park...	<i>First part of the sentence indicates the limits of what can be shared with the public.</i>
Part A - p.7, second para	Tjukurpa is the foundation of Anangu landscape management and includes: Tjukurpa is the foundation of Anangu <i>caring for country</i> and includes:	<i>Amendment made to the plan.</i>
Part B -	<i>Nganampa miri tjuangku wirur kulira tjunkula wanting</i>	<i>Amendment made to the plan.</i>

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p.12, under 1	Query the word “wanting” here. Check whether this is correct.	
Part B - p.12, 1.3 Planning process	The review (DNP 2015) reviewed.... The review looked at	<i>Amendment made to the plan.</i>
Part B - p.13, 1.3 Planning process	During the drafting stage of this plan, park staff also conducted extensive consultations with over 50 Anangu during participatory planning meetings... During the drafting stage of this plan, park staff and the CLC also conducted extensive consultations with over 50 Anangu during participatory planning meetings...	<i>Amendment made to the plan..</i>
Part B - p.14, Table 1	Uluṛu Kata Tjuṛa National Park is jointly managed park between..... Uluṛu Kata Tjuṛa National Park is jointly managed park between by	<i>Amendment made to the plan.</i>
Part B - p.14, Table 1	The park’s first priority is conserving the significant natural and cultural values of the area. Anangu have always said Tjukurpa is the number one priority.	<i>Amendment made to the plan.</i>
Part B - p.14, Table 1	The park was proclaimed in 1977 under the National Parks and Wildlife Conservation Act 1975 (Cth) and continues as a Commonwealth reserve under the EPBC Act pursuant to the Environmental Reform (Consequential Provisions) Act 1999 (Cth)... Is the Environmental Reform (Consequential Provisions) Act 1999 (Cth) an enabling piece of legislation? Is it still relevant? Suggest removing.	<i>Amendment made to the plan.</i>
Part B – p.15	... one of the oldest human societies ...	<i>Amendment made to the plan.</i>
Part B - p.20, Figure 4	Can this diagram (canopy) look more like a mulga tree? It looks like a desert oak, but the text (and Anangu) specifically refer to mulga. It would also be good to replicate this in language for use by the joint management partners. Make the canopy broader with lower and more branches? Translate in to language as well.	<i>This image was endorsed by the Board.</i>
Part B - p.23, Image	Working together, <i>malparara</i> way Use new image.	<i>This image was endorsed by the Board.</i>
Part B - p.24 – Objectives	2.2 -..... to implement this management plan and the Board’s and Director’s decisions. to implement this management plan and decisions made by and the Board’s and Director’s decisions.	<i>Amendment made to the plan.</i>
Part B - p.25, last para	 – particularly the EPBC Act and EPBC Regulations, the management plan and park lease agreement. – particularly the EPBC Act and EPBC Regulations, the Land Rights Act , the management plan and park lease agreement.	<i>Amendment made to the plan.</i>
Part B - p.26, first para	A key aspect of joint management is consulting with Nguraṛitja when making decisions about managing the park. The Director of National Parks and the Central Land Council (CL C) developed	<i>Amendment made to the plan.</i>

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	traditional owner consultation guidelines which the Board has approved, to assist Parks Australia staff meet the Director's legal obligations associated with the joint management of the park. It would be good to clearly define the role of the CLC in supporting joint management arrangements under the ALRA and park lease. Refer to specific ALRA text.	
Part B - p.27, Figure 6	1. Symbols could be used instead of text to represent working groups and JMPT E.g.  2. Is it still called the "Joint management partnership Team?" 3. Are "Anangu" and "Nguraritja" the same? 4. Consistency with rest of plan: Joint management partnership team consists of representatives from the Central Land Council, a Muṯitjulu Liaison Officer, and the Board Secretariat). 5. Query whether referring to specific working groups here is useful.	1. This text was endorsed by the Board 2. JMPT – yes. 3. Differences described in Glossary and a few pages further on. 4. Amendment made to the plan. 5. Intention is for a conceptual diagram of the key components rather than specific arrangements which may change in the life of this plan.
Part B - p.28, Figure 7	Figure 7: Example of how the Board discussed and approved major items in the preparation of this management plan Anangu should be given the chance to finesse their draft ideas in a painting or schematic.	<i>This image was endorsed by the Board</i>
Part B - p.29, fifth para	The CLC plays an important role in the joint management of the park by consulting with Anangu on behalf of Parks Australia, monitoring joint management and the implementation of the management plan and ensuring that the provisions of the Lease are upheld.	<i>CLC's role in joint management has already been made clear, with the repetition considered unnecessary.</i>
Part B - p.30, first para	At the time of preparing this plan, it comprises the CLC Joint Management Officer, Muṯitjulu Liaison Officer, Board Secretary, and the Park Manager. It operates under Terms of Reference determined by the Board. Is this true? The Muṯitjulu Liaison Officer is really a "role" performed by more than one person in community.	<i>Amendment made to the plan.</i>
Part B - p.30, prescription 2.1.4	Board working groups The shift from Consultative Committees to working groups. Will this require new TOR to be developed for each group?	<i>No. The 'consultative committee' is simply the name given to working groups established by the Board.</i>
Part B - p.31, last para	The Board will maintain the working groups under this management plan, and may establish new working groups to provide advice... Good to see this – potential for an enterprise development working group. Getting all of the various	<i>Noted.</i>

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	agencies to be present in support of specific Anangu ventures would be really valuable. This could tie to procurement commitments, and how to achieve them, too.	
Part B - p.31, prescription 2.1.5	Unless otherwise determined by the Board, maintain the operation of the Joint Management Partnership Team. Maintaining the JMPT is essential for MLO role and community engagement. Unless otherwise determined by the Board, Maintain the operation of the Joint Management Partnership Team.	<i>This should remain within the power of the Board to determine, to enable developments towards sole management should that be needed, for example.</i>
Part B - p.31, prescription 2.1.6	Develop guidelines and procedures to assist Parks Australia staff to comply with the Director's obligations under this management plan... All park policies should be reviewed for Anangu engagement.	<i>Agree with the point, but note that this refers to the how and when of consultation, not if it should occur.</i>
Part B - p.31, Action 2.1.7	Support Board meetings in ways that enable members to effectively contribute to making joint and informed decisions Change to "Support Board and its sub committees...	<i>The Board needs to decide the priorities for support of their subsidiary bodies, which may change in number and priority from time to time.</i>
Part B - p.31, Action 2.1.7	Add new dot points Agenda created and approved by a secretariat consisting of Board chair plus at least 1 other Anangu member, Park Manager, Board Secretary and the CLC Joint Management Officer Ensure Agendas for all Board and subcommittee meetings close two weeks before meeting to allow enough time for Board consideration of Agenda items and Anangu member consultation	<i>Arrangements concerning the conduct of Board meetings should be within the purview of the Board itself.</i>
Part B - p.31, prescription 2.1.11	Review the Lease agreement with CLC in consultation with Nguragitja at least once during the life of this management plan. It is a requirement of the lease that CLC and director of Parks review at least once every 5 years, and this plan goes for 10 years. Also it has been so many years since the lease was last reviewed - latest version 1994.	<i>Amendments made to the plan.</i>
Part B - p.33, column 2, last dot point Prescription 2.1.3(d) and Table 2	Issuing of subleases, commercial activity licences or occupation licences Subleases require consent of the ALT.	<i>Note that subleases require the consent of the ALT.</i>
Part B - p.33, column 3, last dot point Prescription	Proposal must be approved by the Board before the Director carries out the management activity or issues an authorisation Some proposals require consent of the Aboriginal Land Trust, and need approval by the Central Land Council.	<i>Amendments made to the plan.</i>

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2.1.3(d) and Table 2		
Part B - p.34, first para	including director's responsibilities under the EPBC..... Include reference the Land Rights Act	<i>Amendments made to the plan.</i>
Part B - p.34, fifth para	Carrying out on-country activities together is another important way of including traditional knowledge in the park's cultural and natural resource management programs. In addition to the day-to day park operations , carrying out on-country activities together is another important way of including traditional knowledge in the park's cultural and natural resource management programs.	<i>Amendments made to the plan.</i>
Part B - p.34, 3rd para	park staff also consult with Aṇangu ... Park staff and CLC also consult with Aṇangu	<i>In a previous reference to the CLC in the text, it is clear that CLC consult with Aṇangu , as do Park staff, hence 'Park staff <u>also</u> consult ... '</i>
Part B - p.35, new dot point	Challenges · Engaging in joint planning processes with Kaṭiṭi Petermann IPA and Yulara.	<i>This is covered in Chapters 2 to 5.</i>
Part B - p.35, new action	Add additional Action 2.2.8 Formalise joint planning arrangements and representation with Kaṭiṭi Petermann IPA and Yulara.	<i>Amendments made to plan.</i>
Part B - p.39 Performance Indicators	Add new Performance Indicator · Gain an understanding of land condition in the park, including the level of ecosystem function	<i>Agree with the intention, but note that this indicator is more of a method than an indicator – an approach rather than an indication of outcomes. It is set at a higher level than the others and would encompass most of them.</i>
Part B - p.40, Figure 8	Figure 8: Some Aṇangu significant sites and places at Uluru Have all these sites been approved for inclusion?	<i>These are all areas visible from the Base Walk, and the image has been used in management plans and training material for some time.</i>
Part B - p.41, second para/feature box	ICIP Include some reference here to work being undertaken. E.g. The Board and Parks work with CLC and other stakeholders to ensure ICIP rights are protected.	<i>Amendments made to the plan.</i>
Part B - p.42, Figure 9	Figure 9: Aṇangu perception of the landscape with major landmarks extending outside the park boundary Aṇangu should be given the chance to finesse their draft ideas in a painting or schematic. This one in particular is upside down (as the author Rene has placed her country at the top – Kulpitjata is south of Uluru).	<i>Several attempts were made to commission artwork, however COVID restrictions have stalled this process indefinitely. The Board did endorse the draft plan inclusive of notes and images. Furthermore, the perception of the artist is presumably well represented in this image, even if that view appears 'upside</i>

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		<i>down' to people used to north always being at the top of the map.</i>
Part B - p.43, Figure 10	Figure 10: Indigenous communities and homelands in the lands surrounding the park It would be good to somehow reflect tenure as the majority of the land is Aboriginal freehold under the ALRA. Legend: Protected areas - could separate out to "IPAs" and "National Parks"	<i>The intention of the figure is to represent the location of homelands and communities in relation to protected areas. Additional information risks loss of clarity.</i>
Part B - p.44, second para	For this reason, a secure 'keeping place' was constructed at the park to house sacred and repatriated material. Technically, the keeping place was constructed within the boundary of the Muṭitjulu Community (near the oval).	<i>Reasonable, make amendments. Changing to 'keeping place constructed for the community' will hopefully discourage curiosity by visitors.</i>
KatitiPart B - p.44, Para 3	The Northern Territory Aboriginal Sacred Sites Act 1989 (NT) and the Heritage Act 2011 (NT) are also relevant to the protection of sacred sites and certain objects. Any ground disturbing works will require a CLC sacred site clearance certificate.	<i>Amendments made to the plan to address this point.</i>
Part B - p.48, 3.1.2	Instead of 'where possible, incorporate traditional Anṁangu knowledge and skills'. 'encourage incorporation of traditional Anṁangu knowledge and skills'	<i>These are the principals for research and monitoring that underpin decision-making under the plan for R&M activities. The difference is whether the R&M activities 'incorporate' or 'encourage the incorporation' - the incorporation should be by doing the R&M activity, rather than in encouraging that it be done.</i>
Part B - p.48, 3.1.3	The Director may carry out research and monitoring that involves... The Director, with BOM approval , may carry out research and monitoring that involves...	<i>As a 'proposed action' the authorisation of the action would trigger the need for Board approval if it has a more than negligible impact on park values. Not clear why the Director would need Board approval for R&M activities with negligible impact.</i>
Part B - p.48, 3.1.4	Organisations and individuals may carry out research and monitoring... Organisations and individuals, with BOM approval, may carry out research and monitoring...	<i>As above.</i>
Part B - p.48, 3.1.10	d. develop protocols and policies to ensure that research, monitoring and site works are carried out in accordance with legal and cultural obligations develop protocols and policies complying with CLC sacred site clearance process to ensure that research, monitoring and site works are carried out in accordance with legal and cultural obligations	<i>This point has been addressed across the plan.</i>
Part B - p.48, 3.1.10	New sub-action f. ensure active engagement of Anṁangu in implementation	<i>The proposed sub-action doesn't fit with the existing (e). This submission is just recommending that the protocols and policies prepared under the Action include measures and process to ensure active engagement of Anṁangu . Amendment could be</i>

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		<i>made by the Board.</i>
Part B - p.49, 3.1.11	b. looking after culturally significant sites Does this include the keeping place? How?	<i>Broad enough to include any place that Anangu want, but not necessary to list individual sites.</i>
Part B - p.49, 3.1.13	Work with Anangu to collect, store and manage cultural information and material using cultural management databases and other technologies Should the park develop a policy on this? Does one exist? If so mention it.	<i>Care must be taken to not refer directly to external documents like this policy. The Parliamentary Committee that review legislative instruments will require the policy to be publicly available at the time the plan is made, the plan or the Explanatory Memorandum (EM) to tell people how to access the policy, and then the policies are incorporated into the plan as at the point in time the plan is made (e.g. the policy cannot then be changed for the 10 years of the Plan).</i>
Part B - p.49, 3.1.14	Seek expert advice and provide appropriate training for Anangu for the management of cultural heritage sites, particularly rock art.	<i>Anangu capacity building is covered in Chapter 4.</i>
Part B - p.49, 3.1.15	Liaise with relevant stakeholders to help address water sustainability and quality issues affecting the park, Muṯitjulu and Yulara and including... And c. promoting efficient use of water by park residents, licence and permit holders.	<i>Amendments made to the plan.</i>
Part B - p.50 Para 8	The first para is very negative. Change to reflect the strength of what exists (as per the second para). For example, could start with explaining that culture is strong and then lead into the desire of Anangu to keep it strong and. Maintain the sentiment which is more opportunities for Anangu to transfer knowledge between generations.	<i>Considered but not a suggestion taken up by the Board.</i>
Part B - p.52, Para 1	Anangu want to ensure that all significant sites within the park are recorded, maintained and protected from threats. Need to mention there are many species significant to Anangu too (tjukurpa, bush foods and medicines). Anangu want to ensure that all significant sites and species within the park are recorded, maintained and protected from threats.	<i>Amendments made to the plan.</i>
Part B - p.53, Para 2	It can affect ecosystem function by out-competing native plant species, removing suitable habitat for native animals and reducing the amount of bush foods available for Anangu . It can affect ecosystem function by out-competing native plant species, removing suitable habitat for native animals and reducing the amount of bush foods and medicines available for Anangu .	<i>Amendments made to the plan.</i>

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Part B - p.53, Para 4	Aṇangu knowledge and tracking skills are invaluable assets when monitoring invasive species... Not just invasive species, but all animals. Tracking methodology is used in fauna surveys on park and is important for inter-generational, cross-cultural skill transfer.	<i>This section is specifically about introduced plants and animals rather than the methods and skills used to manage and monitor them.</i>
Part B - p.55, Para 1	Fire is also used for landscape scale ecosystem management, and often involves working cooperatively with neighbours through a regional burning approach. Fire is also used for landscape scale ecosystem management, and often involves working cooperatively with neighbours through a regional planning and burning approach.	<i>The 'approach' contains the idea of planning already, and perhaps without the connotations of formal written planning, which is appropriate.</i>
Part B - p.55, Para 4	Fire management in the park is subject to the Northern Territory Bushfires Management Act 2016 in so far as it is not inconsistent with the EPBC Act. The fundamental principle established by the Bushfires Management Act is that the responsibility for bushfire management rests with the landholder. The park works with the Central Land Council, Northern Territory Government agencies (e.g. Fire and Rescue Service and Bushfires NT) and neighbours to adopt a regional approach to fire management. In accordance with the Northern Territory Bushfires Management Act 2016, the park works with adjoining landowners and relevant agencies including the Central Land Council, Northern Territory Government agencies (e.g. Fire and Rescue Service and Bushfires NT) to adopt a regional approach to fire management.	<i>Amendments have been made on legal advice, following the intent if not necessarily the submission's suggested words.</i>
Part B - p.57, 3.2.12	a. implementing activities and programs which utilise Aṇangu cultural knowledge and skills a. implementing activities and programs which engage with Aṇangu , their cultural knowledge and skills	<i>Amendments made to the plan.</i>
Part B - p.57, 3.2.12	f. seeking funding through philanthropic or other organisations to support Aṇangu cultural knowledge preservation and protection. This should receive core funding and be identified in annual operational budgets.	<i>Amendment made to the plan to clarify that this refers to the option to seek additional funding, over and above ordinary budget and operational planning.</i>
Part B - p.58, 3.2.15	Monitor and maintain rock art sites including conservation assessments, recording of site assessments and long-term programs for protection and maintenance. Provide appropriate training to monitor and maintain rock art sites including conservation assessments, recording of site assessments and long-term programs for protection and maintenance.	<i>Aṇangu capacity building is covered in Chapter 4.</i>
Part B - p.58, 3.2.18	Implement conservation programs to protect significant Aṇangu species and those listed under the EPBC Act and Northern Territory legislation from the impacts of threatening processes.	<i>Significant Aṇangu species are already cultural (and natural) values of the park, and are the focus of protections and conservation action.</i>
Part B - p.58, 3.2.22	Monitor land and vegetation condition and change using a variety of methods. This may include the use of monitoring points, vegetation sampling and remote sensing. Monitor land and vegetation condition and change by implementing a remote sensing land	<i>Overly specific, implying an obligation to use remote sensing even if not useful, possible or appropriate.</i>

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	assessment methodology for the park. This may include monitoring points and vegetation sampling.	
Part B - p.59 3.2.26 3.2.27	Conduct consistent and ongoing targeted control of buffel grass Conduct consistent and ongoing control of other weed species that threaten priority....	<i>Unclear what this adds, but risks confusion – for instance, ‘ongoing’ may not be appropriate in a place if a particular control action has lasting effect, and consistent may not be appropriate if circumstances change.</i>
Part B - p.60, Table 4	Table 4: Impact assessment procedure Regarding requirement for a sacred site clearance.	<i>Amendments made to the plan.</i>
Part B - p.62, Table 4, column 2, last dot point Prescription 3.3.1(a) and Table 4	New types of commercial (business) activities and commercial activities requiring exclusive or long term access to areas of the park not generally open to the public Likely to require consent of the ALT, approval by CLC.	<i>ALT and CLC consent is a separate legal requirement from the Park Lease. Table 4 sets out the requirements established by the management plan for impact assessments, it is not necessary to include additional legal requirements for approvals the already exist independently of the management plan. Reference to ALT consent is made in the intro text to Section 6.5 Subleases, licence and associated occupancy issues.</i>
Part B - e 65, Table 5, Point 4, 3.3.1(b) and Table 5	How will Anangu benefit from the action? Additional dot points: · Access to country (graded roads) · Exposure to new experiences · Contracts for service	<i>There are many possible benefits, and the list is not exhaustive. It is open for proponents to include any benefits, not just those listed; and for those benefits to be considered in the approval process.</i>
Part B - p.68, Diagram Snapshot of Chapter 4	Performance indicators Additional dot points: · Training opportunities provided for Anangu · Contracts offered to Aboriginal businesses and organisations · The Park should have a structured commitment to how it will increase procurement outcomes.	<i>Amendments made to the plan.</i>
Part B - p.68, Diagram Snapshot of Chapter 4	Performance indicator: Level of impact Muṯitjulu community has on natural and cultural values and water resources. Delete – irrelevant	<i>The sentence amended to add impact ‘on management of’ natural and cultural values.</i>
Part B - p.70, third para	The Director contracts Anangu enterprises to provide goods and services for the park. Additionally, the making and selling of traditional artefacts (e.g. wooden implements) and contemporary artwork also provides a major source of income for Anangu , and is supported by Parks Australia. What does this mean? Are Anangu staff encouraged and allowed to earn additional income? As a federal agency, the park is held to the Indigenous Procurement Policy, but should go further –	<i>This section is about Anangu enterprises being encouraged to provide services to the Director, regardless of if the particular individual is also staff or not. Care must be taken to not refer directly to external documents like this policy. The Parliamentary Committee that review</i>

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	given the location and joint management -, and have a proactive approach to increasing Anangu participation in their supply chain. Arguably, there should be a reference to a procurement policy, where commitments are outlined.	<i>legislative instruments will require the policy to be publicly available at the time the plan is made, the plan or the EM to tell people how to access the policy, and then the policy are incorporated into the plan as at the point in time the plan is made (e.g. the policy cannot then be changed for the 10 years of the Plan). This would prevent the Director from going further, or meet any future improvements to the policy..</i>
Part B - p.72, Para 1	Muṯitjulu community can develop sustainably in ways that meets community aspirations with minimal impact on the park's cultural and natural values	<i>Positive impact should not be minimised.</i>
Part B - p.72, Para 3	Muṯitjulu community is home to many Anangu with strong cultural connections to the park under Tjukurpa.	<i>Amendments made to the plan.</i>
Part B - p.73, Para 4	Security of tenure will attract new public and private infrastructure and investment and enable economic development opportunities for Anangu to pursue their social, cultural and economic aspirations. Anangu will have direct input into all decisions about land use in Muṯitjulu and will realise an economic return from their land through the collection of rent. Current tense: Secure tenure provides opportunities for new infrastructure investment and enables Anangu to pursue their social, cultural and economic aspirations. Anangu now have direct input into all decisions about land use in Muṯitjulu and receive rent from their land.	<i>Amendments made to the plan.</i>
Part B - p.75, Para 2	The MLO's role is to represent the community on the Joint Management partnership team , liaise between Muṯitjulu community and the Director, about matters relevant to the park's management and Muṯitjulu community and to present Muṯitjulu community views about these matters to the Board.	<i>Amendments made to the plan.</i>
Part B - p.76, prescription 4.2.1	The Director and the Board recognise the rights of Anangu to reside in the Muṯitjulu community to maintain their ongoing association with the park. The Director and the Board also recognise support the need for Anangu to pursue their social, cultural and economic aspirations and for the Muṯitjulu community to develop sustainably.	<i>Amendments made to the plan.</i>
Part B - p.76, prescription 4.2.3	Subject to section 4.2.4, minor to moderate works, excavations and construction of structures may be carried out in the Muṯitjulu Township Zone with a CLC sacred site clearance and without approval from the Director if the action is likely to have less than a significant impact on the environment or cultural and natural values of the park or Nguraritja	<i>Amendments made to plan</i>
Part B - p.76, prescription 4.2.5	Major works, excavations and construction not covered by section 4.2.3 may be carried out in the Muṯitjulu Township Zone only in accordance with a CLC sacred site clearance and a permit issued by Director, which may be given subject to conditions.	<i>Amended but not in form proposed, with the requirement being part of the Note following.</i>

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Part B - p.77, prescriptions	Add prescription about lighting fires in community, fuel reduction burns, wildfire management?	<i>Covered in Chapter 3- Fire management as part of landscape management. Lighting fires by Anangu is not unlawful under Division 12 of the EPBC Regulations and therefore the management plan doesn't need to have a prescription that authorises lighting fires in the community (doing so is already lawful).</i>
Part B - p.78, prescription 4.2.18	Meet regularly with MCAC in relation to items relevant to this management plan, including the sustainable development of Muṯitjulu community. Who should meet? Director (or park Manager?) regularly with MCAC in relation to items relevant to this management plan, including the sustainable development of Muṯitjulu community.	<i>All actions are legal obligations on the Director. Reference to the Director in this plan is always taken to be the Director or the Director's delegate.</i>
Part B - p.78, prescription 4.2.25	Support programs for managing non-native animals, including educational programs. Support programs for managing fire and introduced animals , including educational programs.	<i>Amendments made to the plan.</i>
Part B - p.80, Snapshot	How much Anangu participate in education, interpretation and media activities Level of Anangu engagement in education, interpretation and media activities	<i>Amendments made to the plan.</i>
Part B - p.80, Table, Objective 5.1	Enhance visitor access, and increase the range and quality of cultural and natural experiences available in the park	<i>Visitor access is a significant part of the visitor experience, and an important objective for the Director.</i>
Part B - p.84, Action 5.1.11	Develop new or enhance existing visitor infrastructure and activities to increase the range and quality of visitor experiences. This will be done in ways that... New point relating to potential annual festival: f. promote the celebration of joint management	<i>Celebrating joint management may not be relevant to all new visitor infrastructure and activities.</i>
Part B - p.86, Action 5.2.5	Work with the tourism industry, Yulara and the Kaṯiṯi Petermann IPA to ensure their interpretative and promotional information is consistent with and complementary to the park's interpretive information.	<i>Amendments made to the plan.</i>
Part B - p.89, fifth para	There is greater potential for Anangu to work with the tourism industry to develop cultural tourism products and activities. For example, through joint tourism enterprises or products.	<i>Amendments made to the plan.</i>
Part B - p.90, third dot point	Working together with Ayers Rock Resort, government agencies, the tourism industry and Muṯitjulu community to make sure commercial tourism in the park is developed in a way that is sustainable Working together with Ayers Rock Resort, the Kaṯiṯi Petermann IPA , government agencies, the tourism industry and Muṯitjulu community to make sure commercial tourism in the park is developed in a way that is sustainable	<i>Amendments made to the plan.</i>
Part B -	Making sure we Consulting with the tourism industry about any proposed changes to visitor access	<i>Amendments made to the plan</i>

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p.90, Challenges, last dot point	or management, and give them enough time to prepare....	
Part B - p.90, Action 5.4.2	If a commercial activity requires long-term use of a building or area the activity will be authorised by a licence to occupy, or sublease, as appropriate to the circumstances. Sublease will require consent of ALT and approval of CLC	<i>Amendments made to the plan.</i>
Part B - p.91, Action 5.4.10	Work with the tourism industry and the Kaṭiṭi Petermann IPA to encourage and facilitate the establishment of new commercial tourism activities and services consistent with the park's values, to increase the range and quality of visitor experiences	<i>Amendments made to the plan.</i>
Part B - p.91, Action 5.4.11	Encourage the establishment of Anangu owned commercial tourism accommodation in the park. Encourage and actively support the establishment of Anangu owned commercial tourism and accommodation in the park.	<i>Amendments made to the plan to 'encourage and <u>promote</u>', to avoid potential inconsistency with rules on spending public money.</i>
Part B - p.96, Prescription 6.1.1	The Director may carry out an excavation, erect a building or other infrastructure, or carry out works, provided the proposed action is consistent with Section 2.1 Board of Management and has been assessed in accordance with Section 3.3 Assessment of proposals and has a CLC sacred site clearance certificate.	<i>Amendments made to Table 2 to address this point.</i>
Part B - p.96, Actions	New actions: - Investigate and pursue sustainable alternatives - Reference Visitor Infrastructure Plan and 5 priority precinct areas: culture centre, Uluṛu, sunrise/sunset viewing, entry station, Kata Tjuṭa	<i>Sustainability added to 6.1.6. However, care needs to be taken to not incorporate other documents by reference. This is something that the Parliamentary Committee that reviews legislative instruments will pick up and either require publication of the external document (which is incorporated as at a point in time) or it will recommend disallowance of the plan in its entirety.</i>
Part B - p.99, fifth para	Northern Territory Police are based at Yulara and also at Muṭitjulu. NT Police have announced they are withdrawing from Muṭitjulu.	<i>Amendments made to the plan.</i>
Part B - p.100, Actions	New action: Maintain staff emergency response accreditations e.g. AIMS Incident control, wildfire suppression, search and rescue.	<i>Amendments made to the plan.</i>
Part B - p.101, second para	Encouraging compliance with relevant legislation is important for protecting park values; infrastructure; visitor, staff and contractor safety; and the interests of Nguraṭitja. Encouraging compliance with Tjukurpa and relevant legislation is important for protecting park values; infrastructure; visitor, staff and contractor safety.	<i>Amendments made to the plan.</i>
Part B -	New dot point:	<i>Specific reference to just one element of compliance risks</i>

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p.101, Challenges	· Monitoring existing commercial arrangements for compliance.	<i>makes the intention to include others questionable. Current words are comprehensive.</i>
Part B - p.101, Action	New action: - Maintain ranger and warden compliance accreditation	<i>This is covered in Action 6.4.1</i>
Part B - p.103, Quotation	The future is looking good. Keep climbing through the clouds, proudly. Together. ??? This translation needs checking... “The future looks good.... good country... happy...together.”???	<i>All translations have been rechecked and confirmed.</i>
Part B - p.103, Challenges	New dot point: · Unsolicited proposals	<i>This is covered under unexpected actions.</i>
Part C - Appendices p.106, Glossary – Aboriginal land	Land held by an Aboriginal Land Trust for an estate in fee simple under Land held by an Aboriginal Land Trust for as an estate in fee simple under	<i>Amendments made to the plan.</i>
p.138 – index “decision- making”	Decision making and decision-making Check for consistency through whole document, noting the index refers to decision-making so all references to decision making should be changed to decision-making.	<i>Amendments made to the plan.</i>
Executive Director of Township Leasing		
General	Establishing the Muṭitjulu Township sublease area as a Managed Resource Protected Area under EPBC Act and Regulations. Recommends proclamation as category VI	<i>As per section 347 of EPBC Act, and section 4.2 of the management plan, Muṭitjulu township is already assigned IUCN category VI in this plan.</i>
General	Area planning and zoning within the Muṭitjulu community. Recommends that an area plan and zoning scheme for Muṭitjulu be adopted by all stakeholders as part of the 2020-2030 Management Plan.	<i>This is a much bigger piece of work than can be incorporated in to the management plan. An area and zoning plan would need to be created, consulted on, proclaimed etc.</i>
General	Facilitating the provision of essential services to the Muṭitjulu community Proposes that the Plan be treated as an opportunity to link essential services infrastructure in the Park with parallel upgrades in Muṭitjulu	<i>Planning, consultation and negotiation regarding transferral of responsibility for essential services in Muṭitjulu are ongoing.</i>

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General	Establishing a resolution process where the requirements and obligations of the Park's management may potentially conflict with development aspirations in Muṭitjulu Recommends that a formal process be established whereby the Executive Director, on behalf of the Muṭitjulu consultative forum, is able to raise concerns or seek resolutions when the obligations of managing the Park as per the EPBC Act and Regulations unnecessarily prevent development in Muṭitjulu.	<i>Chapter 2, Table 2 outlines the consultation process for actions, activities and construction proposals within the Park, including Muṭitjulu. EDTL would be consulted as a stakeholder where relevant.</i>
Jeremy Sleep		
Part A - last para	“Joint management also aims to ensure visitors have the best opportunity to enjoy, appreciate and learn about the park and Aṇangu culture.” Disagree: The true Aṇangu culture could never be truly understood by the public as a lot of it is kept secret or continually changing!	<i>The plan does not claim ‘true understanding’ but the ‘best opportunity to ... learn’.</i>
Part B - Table 1 - International listings, point 1	Disagree: “Man’s interaction with his natural environment”. It is only natural for man to explore the land from every vantage point given the nature of Uluru and surrounding areas. Climbing Uluru is only a natural interaction with the natural environment, yet people are now prohibited from doing so, yet Aṇangu people will still be able to.	<i>This is the inscription on the World Heritage Listing for the park, and refers to Aṇangu cultural interaction with their natural environment.</i>
Part B - Table 1 - Values, point 3	Tjukurpa is observed today in the park as it was thousands of years ago. It embodies the principles of religion, philosophy and human behaviour that are to be observed in order to live harmoniously with one another and with the natural landscape. Shouldn’t this consider that we are all of this Earth, we are all equal and should be able to live harmoniously with each other in regards to interacting with the natural environment as mentioned in the International listings section? Shouldn’t the intention of many visitors to climb Uluru therefore be observed and considered in order to live in harmony with one another rather than segregating people purely out of culture? Does erecting man made fencing around Uluru to stop people approaching the climbing route not alter the very natural presence and appearance of Uluru and in effect oppose Tjukurpa principles? I couldn't think of anything worse for the whole National Park than erecting ugly steel man made fencing around a natural formation of the Earth. This is going nowhere to preserving the natural environment of Uluru , it is destroying it, and it is the Aboriginal community that is bringing about	<i>The Board have been very clear in their understanding of what Tjukurpa requires.</i>

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	this destruction, it is incredibly hypocritical and just shows that segregating people rather than preserving nature is the true motive.	
Part B - Table 1 - last sentence	“As a result of these values, the park is of great economic, social and research significance to the community and the broader region.” Yet as time progresses we are seeing an even greater divisive push by the Aboriginal communities in Australia placing ever growing restrictions on non Aboriginal people born and bred in this country. Out of the entire known history and the presence of life on Earth including the claimed oldest culture of people (the Aboriginal people), we are still merely a very tiny dot on the timeline of Earth's history and yet due to a cultural belief, even further restrictions are being placed on us all, and for what reason? Life is riddled with risk, wear and tear, change, inclusion, new life, and so on. To suggest that Uluru can remain untouched if people no longer can climb it is delusional at best.	<i>The comment appears to accept the text, and so it remains unchanged.</i>
Part B - 2.1, para 6	“a joint commitment to maintain country and culture can only occur if we respect and comply with Anangu law (Tjukurpa) and Pirlanpa (Australian) law—particularly the EPBC Act and EPBC Regulations, this management plan and the park lease agreement.” With this theory in mind what is stopping other “cultures” from creating their own set of laws in Australia that could also impact Uluru ?. We have one law system in Australia, not multiple law systems. If we continue to have this theory of multiple laws within one great legal system, it will very quickly undermine any legal system and create chaos due to claims on discrimination, cultural intolerance, disparity and other detrimental elements of having a legal system open to alternatives.	<i>There is no suggestion of non-compliance with the law, and so the text is unchanged.</i>
Part B - 4.1 Objective	Objective—What needs to happen: Anangu are employed in and benefit in other ways from the management and visitor use of the park, whilst maintaining Tjukurpa and culture. Again there is cultural segregation and discrimination. Anangu people are being given opportunities and facilities to promote their lives and obtain a career at Uluru and surrounding areas, and this is predominantly afforded by tourists venturing to one of the most remote places on Earth. Aboriginal people are given so many options regarding employment throughout Australia under our own instigated and fairer system of equal opportunity, yet we as a people are still segregated by the Aboriginal community and placed off limits to various parts of Australia and now indeed Uluru .	<i>Many government programs exist for increasing employment, and increasing Indigenous employment is a priority for the Federal Government.</i>

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	When will the double standards cease? If the beliefs and mandates of Tjurkpra are that critical, and employment of Anangu people is so important, then why do many of them avoid working or simply have no interest in doing so? Why is there such a need for Anangu people to be employed if they formerly lived off of the land and protect places such as Uluru with great vigour? It is very hypocritical and again segregating people based out of their culture or race. If white Australian people mandated only white Australian people are to be employed in a particular job or location, ie Ayers rock resort, there would be a massive law suit under Australian anti discrimination laws, formed by no Aboriginal community or leader. So white Australian laws matter when it suits Anungu people, but then Tjukpra matters when it suits them also? This is exactly why there cannot be an undermining of Australian law because of a minority cultural belief although most would still like to consider the Anangu culture with respect and value, I know I would, but not if it means the rest of the people of this Earth are prohibited by a culture of such minority dictating to the rest of us where we can and cannot venture in a natural environment formed by mother nature. Other religious institutions are also bound by Australian law with regards to the activities they carry out in their places of worship, what makes the Anungu culture so different that they can over ride Australian law?	
Part C - Appendix A- glossary	Anangu (literally, ‘people’) a word used by Pitjantjatjara/Yankunytjatjara speakers to refer to themselves individually or as a group; within the context of this management plan, Anangu refers to people with traditional affiliations to the region who may or may not be traditional owners (Nguraritja) So does this not mean that foreign tourists to the area could be considered Anangu people as well? The murky waters of Anangu culture is being made even more and more evident as an invented theory to try and push an agenda by Aboriginal people to override everyone else and for what reason when the reasons are so broad and unclear? Wouldn't inclusion, welcome and acceptance of others regardless of their intentions or interests be a more beneficial cause than to try and segregate people?	<i>No. Anangu use the word to refer to themselves, to people with traditional affiliations to the region who may or may not be traditional owners.</i>
Part B - 5.1	5.1 Visitor experience and site management Enhance visitor access, and increase the range and quality of cultural and natural experiences available in the park.	<i>The range and quality of experiences available to visitors continues to increase including through opening access to the park in many different ways.</i>

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	How on Earth is this even remotely possible given that as time goes by more and more "access" to the natural experiences in the park are being further eroded by the Anangu community, and therefore lessening the interest visitors have from all over the world? There are so many natural places on Earth riddled with risk, danger and cultural sentiment yet are openly accessible to human kind and rightfully so since we are all of this Earth, we should all be able to experience our natural world to its greatest capacity without restraint purely because of culture. However if people travel great distances and come to Australia to visit one of the most iconic symbols and incredible formations by mother nature, they are being black banned and ever increasingly shut out due to terms of culture.	
- -	Future of Uluru Kata Tjuta National Park' letter Commenter has also included a letter requesting the climb be reopened, on the basis that it is 'just a rock'.	<i>The Board has considered this matter for many years, and has made a clear and well-communicated decision.</i>
Marc Hendrickx		
General comments	Plan breaches section 17-2 of the lease agreement, by moving non-Anangu history to an appendix in the plan, and omits mention of specific Traditional Owners and Park Managers who commented on the climb or worked in the park in the past. A section of the plan be devoted to differing views of Traditional Owners and a sectioned devoted to past Ranger staff.	<i>This is a matter that would need to be determined in accordance with the terms of the lease, is not part of the management plan and has not been raised by the Leasor.</i> <i>This management plan is a legislative instrument that provides the strategic direction for managing the park for a period of 10 years. A comprehensive account of all views on the history of the region is beyond its scope and legislative purpose.</i>
General comments	Plan breaches Racial Discrimination Act, by prevent visitors from exercising their cultural beliefs, and forces Anangu views on visitors. Remove tax-payer funding and make the park privately owned and funded.	<i>The plan has been found by the Human Rights Commission to not breach the Racial Discrimination Act.</i>
General comments	1. It is recommend that Parks Australia establish a museum in the Park that provides information and celebrates the points above. 2. It is recommended that Parks Australia re-open the climb at Ayers Rock in respect and celebration of the rich Aboriginal and non-Anangu cultural traditions of climbing it.	<i>1. This is not a priority of the Board.</i> <i>2. This is contrary to the decision of the Board to close the climb.</i>

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	3. It is recommended that Parks Australia reopen public access to the Kata Tjuta Lookout. 4. The document does not meet the goals and aims of a National Park as it excludes visitors in the decision making process. A visitor representative is required to ensure the plan meets visitor expectations. Based on the draft plan the Land Owners should withdraw from the lease agreement and run the park as a private park. 5. Plan breaches the 1987 World Heritage agreement – climb needs to be re-instated, or Parks need to withdraw from the 1987 world heritage agreement. 6. The plan breaches the Racial Discrimination Act as it does not allow visitors to exercise their own cultural beliefs and forces Anangu beliefs on them. Requires provision for non-Anangu visitors to exercise their own cultural beliefs. 7. The plan breaches the Lease Agreement section 17(2). 8. Plan needs to be re-framed to provide for: a. Recognition of past history b. Respect the wishes of past elders who climbed and shared their space with visitors c. Provide for greater public access including to summits	3. <i>This area is open.</i> 4. <i>The goals and aims of the park are determined by the Board of Management, appointed in accordance with the EPBC Act 1999.</i> 5. <i>The park's World Heritage listed values do not include the climb.</i> 6. <i>See response above.</i> 7. <i>See response above.</i> 8. <i>See response above.</i>
General comments	Provision to be made for access changes within life of the plan. The management plan must include provisions for re-opening access to the summits of both Ayers Rock and Mt Olga and the Kata Tjuta Lookout and any other areas should owners change their minds about access.	<i>The management plan already includes the necessary provisions to make this decision.</i>
Part A - Establishment of the park.	Park history is poorly described. Omits park history prior to 1977 Provide complete park history starting circa 35,000 years before present. .	<i>The history described is intended to provide the legal context of the management plan, as a legislative instrument. The park as a legal entity came into existence in 1977.</i>
Part A - Aboriginal land and joint management	Omits mention of Ngaanyatjarra language group.	<i>Ngaanyatjarra lands do not fall within the boundaries of the park. Pitjantjatjara and Yankunytjatjara are noted as the principal dialects spoken in the park.</i>
Part A - Aboriginal land and joint	Incorrect statement. Management of the park is governed by the EPBC Act (1999).	<i>Unclear which statement is considered incorrect. The park is jointly managed by its traditional owners and the Director of National Parks, in accordance with the EPBC Act 1999.</i>

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management 1		
Part A - Aboriginal land and joint management 3	The park is not owned by the Uluru - Kata Tjuta Aboriginal Land Trust, but by the Australian people.	<i>The park is owned by the Uluru-Kata Tjuta Aboriginal Land Trust.</i>
Part A - Aboriginal land and joint management 4	This section downplays consultation between Rangers and NT government and other organisations prior to 1977. Collaborative approach of former administrations be acknowledged in the plan.	<i>This management plan is a legislative instrument that provides the strategic direction for managing the park for a period of 10 years. A comprehensive account of all views on the history of the region is beyond its scope and legislative purpose.</i>
Part A - World Heritage listing	Omits mention of 1987 World Heritage listing for summit views. Withdraw from world heritage listing	<i>The plan reflects the current listing with the intention of accurately describing the legal context of the plan.</i>
Part B - General provisions and IUCN category Table 1- Background	Plan is in breach of lease agreement section 17-2.	<i>See response above</i>
Part B - General provisions and IUCN category Table 1 - Values	Natural values list omits the views available from the summit, listed in the 1987 World Heritage listing.	<i>The plan reflects the current listing with the intention of accurately describing the legal context of the plan.</i>
Part B - General provisions and IUCN category Table 1 - Values	Omits mention of past elders climbing, non-Anangu history and values.	<i>The plan reflects the current listing with the intention of accurately describing the legal context of the plan.</i>
Part B - General provisions and IUCN category1.3 - Planning process	Planning process is invalid as all visitors have been omitted from consultation process.	<i>The planning process laid out in the EPBC Act has been followed, including the public consultation period which generated this comment.</i>
Part B - General	Mutitjulu Township zone and road reserve for town access should be completely excised from the	<i>This is not action that can be done in a management plan.</i>

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provisions and IUCN category 1.5.4 - Prescriptions	Park and managed by NT Government Transfer management to NT government.	
Part B - General provisions and IUCN category Figure 4	Plan states: <i>This means that our system of government must govern the way the land is protected here.</i> This statement is incorrect. The Park is managed under regulations provided for in the governing act and associated regulations: Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).	<i>The EPBC Act provides that the park is governed in accordance with the management plan, which aspires to give effect to the system of government referred to.</i>
Part B - Working and making decisions together Snapshot	Performance indicators need to include measurable outcome. Include visitor numbers as performance indicator.	<i>The suggestion is noted as a useful indicator within the annual budget, planning and reporting cycle – indeed, the indicators is monitored and reported on as a matter of course.</i> <i>Performance indicators relating to visitors are addressed in Part B Chapter 5.</i>
Part B - Working and making decisions together Snapshot	Objectives need to include visitor satisfaction. Consult more widely in formulating the new management plan.	<i>Part B Chapter 2 relates specifically to joint management. Performance indicators relating to visitor satisfaction are addressed in Part B Chapter 5.</i>
Part B - Working and making decisions together 2.1 - Board of Management	A place on the board is required for visitors to ensure visitor expectations, interests and tax payer interests are being met Appoint self to the Board of Management as Visitor representative	<i>The Board is appointed in accordance with the EPBC Act, and comprises 8 Anangu members, the Director National Parks and a representative each from the Ministers for Tourism and Environment and the NT Government.</i> <i>The appointment of Mr Hendrickx would require a legislative amendment and is beyond the powers of the management plan.</i>
Part B - Working and making decisions together 2.1 - Board of	Director of National Parks has a conflict of interest in responsibilities. DNP should stand down from the Board.	<i>It is not clear what the conflict of interest is perceived to be.</i> <i>The Director of National Parks is required by the EPBC Act to be a member of the Board.</i>

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Management		
Part B - Working and making decisions together2.1 - Challenges Table 2	Consultation requirements across all categories require consultation with visitor representative to protect visitor interests	<i>Consultation is done with relevant stakeholders, including, where appropriate, through mechanisms such as visitor surveys.</i>
Part B - Caring for culture and country	Ignores wishes and actions and disrespects past owners.	<i>This contradicts the view of the Board.</i>
Part B - Caring for culture and country	No mention of non-Anangu heritage.	<i>Part B Chapter 3 relates to maintaining the natural and cultural values of the park through traditional land management practices.</i>
Part B - Caring for culture and country3.1 Figure 8	Omits important summit sites. Refer to Mountford, 1965.	<i>Figure 8 is labelled 'Some Anangu significant sites and places at Uluru'.</i>
Part B - Caring for culture and country 3.2 - Supporting retention of cultural knowledge	This section is somewhat ironic as the ban on climbing instituted by the board deliberately ignored the rich traditions and history of past owners who supported the Climb and public access to other parts of the Park now banned (e.g. caves along North face and Kata Tjuta Lookout) including men like Paddy Uluru , Toby Naninga, Tiger Tjalkalyirri and Mitjenkeri Mick.	<i>This contradicts the view of the Board.</i>
Part B - Caring for culture and country 3.2 - Supporting retention of cultural knowledge	Traditional beliefs have been documented by Charles Mountford and Bill Harney, yet no mention to their work is made in the plan.	<i>Retention of cultural knowledge in this context indicates the retention within the community of knowledge which that community now holds.</i>
Part B - Caring for culture and	Potential impacts of proposed actions must be assessed by visitor representative	<i>Consultation is done with relevant stakeholders, including, where appropriate, through mechanisms such as visitor</i>

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country3.3.1- Prescriptions (incl. Table 4)		surveys.
Part B - Livelihoods and other benefit for Anangu	Mutitjulu township to be excised from park and run in conjunction with NT government. Public access to be as for any other public land in Australia.	<i>This is not something that can be done in a management plan.</i>
Part B - Tourism experiences and services Snapshot	Snapshot goal is a racist statement that breaches the Racial Discrimination Act unless it includes reference to non-Anangu culture.	<i>The plan has been found by the Human Rights Commission to not breach the Racial Discrimination Act.</i>
Part B - Tourism experiences and services5.1.10 - Actions	Any working group to include a visitor representative.	<i>Consultation is done with relevant stakeholders, including, where appropriate, through mechanisms such as visitor surveys.</i>
Part B - Tourism experiences and services5.2 - Information, education and interpretation	Refer to general comments about denial of Park history. Park requires a museum to provide information about and celebrate past owners, managers and non – Anangu history.	<i>This is not a current priority for the Board.</i>
Part B - Tourism experiences and services 5.3 - Promotion, marketing, film and photography	Photographic control are overly restrictive. Should be changed to reflect broad community values of freedom of the press, freedom to roam and freedom of expression.	<i>This matter has been widely canvassed through the development of film and photography guidelines, and a branding and marketing strategy. The management plan reflects the established views of the Board.</i>
Part B - Tourism experiences and services5.4 - Commercial operations	Visitor representative to have a say on commercial activities.	<i>Consultation is done with relevant stakeholders, including, where appropriate, through mechanisms such as visitor surveys.</i>
Part B -	Consideration to be given to hand over Park Management completely to Local owners over the life	<i>The Director will continue to consult with Nguraritja on their</i>

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Administration and business management	of this plan to run as a private park free from tax payer influence.	<i>aspirations for the park and its management, in accordance with the park lease and the management plan.</i>
Appendix C	Omits reference to natural values in the 1987 World Heritage nomination that provide for access to the summit for visitors	<i>The plan reflects the current listing with the intention of accurately describing the legal context of the plan.</i>
Appendix D and E	Omits mention of the landscape values visible from the summit. These are referred to in the 1987 World Heritage Nomination	<i>The plan reflects the current listing with the intention of accurately describing the legal context of the plan.</i>
Appendix G	Timeframe confirms that visitors have never been properly consulted in determining management actions and priorities in the park A Visitor representative must be included on the Board with veto rights over Board decisions.	<i>The time made available for public consultation (60 days) in fact exceeded the legislated minimum requirements (40 days).</i>
Appendix J para 1	The section includes a lot of unnecessary commentary and should be kept factual. There is no such thing as a “colonisation process”. This term is post modernist nonsense. Recommend changing to “Ernest Giles and William Gosse were the first Europeans to visit the area and named features in honour of political figures of the day.”	This is not the view of the Board, and the facts of the proposed changes are already included.
Appendix J	Omits mention of Ngaanyatjarra language group	Ngaanyatjarra lands do not fall within the boundaries of the park. Pitjantjatjara and Yankunytjatjara are the principal dialects spoken in the park.
Appendix J para 7	Factually incorrect Pitjantjatjara and Yankunytjatjara people were actively influencing management in the Park from the late 1960s coinciding with the management by Derek Roff.	<i>This is not the view of the Board.</i>