

# Resource Planning and Development Commission

*Report on the Draft  
Waterhouse Conservation Area  
Management Plan May 2000*



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T A S M A N I A

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*August 2002*

*Resource Planning and Development Commission*

Report on the Draft Waterhouse Conservation Area Management Plan May 2000

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## ***Resource Planning and Development Commission***

The Resource Planning and Development Commission is established by the ***Resource Planning and Development Commission Act 1997***.

The Commission has five principal functions:

- to assess and approve local government planning schemes and planning scheme amendments;
- to assess projects of State significance;
- to assess draft State Policies;
- to prepare the Tasmanian State of the Environment Report; and
- to conduct inquiries into the use of public land.

The Commission is part of the State's resource management and planning system, the objectives of which are set out in Schedule 1 of the ***Resource Planning and Development Commission Act 1997***.

The Commission is made up of:

- an Executive Commissioner (Julian Green)
- a Commissioner with planning experience nominated by the Local Government Association of Tasmania (Geoff Davis)
- a Commissioner with expertise and management experience in resource conservation (Bruce Davis)
- a Commissioner with planning experience and experience in industry and commerce (Andrew Edwards)
- a Commissioner with resource conservation or planning experience representing community interests (Lia Morris)
- a Commissioner with public administration experience in regard to project implementation (Jeffrey Gilmore)



## Table of contents

Resource Planning and Development Commission .....	ii
Glossary of acronyms and terms.....	v
1.0 Introduction .....	1
1.1 Ministerial direction to the Commission .....	1
1.2 Background to the Draft Plan .....	1
1.2.1 Preparation of Draft Plan by DPIWE.....	1
1.2.2 Public exhibition of the Draft Plan by DPIWE.....	1
1.2.3 Director's report.....	1
1.3 Review process by the Commission .....	2
1.3.1 Commission reports to the Minister.....	2
2.0 Review of representations and Director's report .....	3
2.1 Introduction.....	3
2.2 Management of fisheries.....	3
2.2.1 Stocking lakes with exotic fish species.....	3
2.2.2 Bait fishing.....	6
2.2.3 Eel netting .....	8
2.3 Wetland management .....	10
2.3.1 Water extraction.....	9
2.3.2 Ramsar wetland – Little Waterhouse Lake .....	10
2.3.3 Dune stabilisation and rehabilitation.....	16
2.4 Vehicle use and beach access .....	17
2.5 Aboriginal heritage .....	19
2.6 Camping.....	21
2.7 Fire management .....	23
2.8 Shacks.....	23
2.9 Horse access.....	24
2.10 Boating access .....	27
2.11 Resourcing .....	26
2.12 Management zones .....	27
3.0 Consolidated principal recommendations.....	28
Appendix 1: Representations received on the Draft Plan.....	37
Appendix 2: Director's report dated 3 December 2001 .....	38
Appendix 3: Schedule 4 - Objectives for management of reserved land, <b>National Parks</b> <b>and Wildlife Act 1970</b> .....	62
Appendix 4: Schedule 6 - Managing wetlands of international importance, <b>Environment Protection and Biodiversity Conservation Regulations 2000</b> .....	63

## ***Glossary of acronyms and terms***

Commission	Resource Planning and Development Commission
Director	Director of National Parks and Wildlife
DPIWE	Department of Primary Industries, Water and Environment
Draft Plan	Draft Waterhouse Conservation Area Management Plan May 2000
EPBC Act	<b><i>Environment Protection and Biodiversity Conservation Act 1999</i></b>
EPBC Regulations	<b><i>Environment Protection and Biodiversity Conservation Regulations 2000</i></b>
IFS	Inland Fisheries Service
LUPA Act	<b><i>Land Use Planning and Approvals Act 1993</i></b>
NPW Act	<b><i>National Parks and Wildlife Act 1970</i></b>
NPWAC	National Parks and Wildlife Advisory Council
PWS	Parks and Wildlife Service, Department of Primary Industries, Water and Environment
TALC	Tasmanian Aboriginal Land Council
TRVA	Tasmanian Recreational Vehicle Association Inc

## **1.0 Introduction**

### **1.1 Ministerial direction to the Commission**

On 5 February 2002 the Minister for Primary Industries, Water and Environment, the Hon. D Llewellyn, directed the Resource Planning and Development Commission (the Commission) to review the representations and the report of the Director of National Parks and Wildlife (the Director) made on the Draft Waterhouse Conservation Area Management Plan May 2000 (the Draft Plan).

### **1.2 Background to the Draft Plan**

The Draft Plan provides for the management of the Waterhouse Conservation Area for the next 10 years. The aim is to provide management direction and to guide development based on a set of defined objectives. The Draft Plan provides a vision for the reserve, to be achieved through the implementation of management objectives, policies and actions.

#### **1.2.1 Preparation of Draft Plan by DPIWE**

The Director of National Parks and Wildlife, Department of Primary Industries, Water and Environment (DPIWE) prepared the Draft Plan in accordance with the requirements of Part IV of *National Parks and Wildlife Act 1970*. During preparation of the Draft Plan DPIWE consulted with community groups, government and non-government agencies and users of the reserve.

#### **1.2.2 Public exhibition of the Draft Plan by DPIWE**

The Draft Plan was made available for public comment from 17 June 2000 to 14 August 2000 by DPIWE. Seventeen representations were received during the public exhibition period (refer to Appendix 1) and a supplementary submission was received outside the exhibition period.

#### **1.2.3 Director's report**

Under section 20A of the *National Parks and Wildlife Act 1970* the Director is required to forward to the Commission a copy of all representations received on the Draft Plan, and a report containing:

***(i) a summary of the representations; and***

***(ii) the Director's opinion on the merits of the representations including whether or not he or she believes the representations to be of sufficient merit to warrant modification of the management plan; and***

***(iii) a summary of any proposed modification to the management plan; and***

**(iv) any additional information the Director considers relevant.”**

The Director provided this information to the Commission on 5 December 2001 (see Appendix 2).

### **1.3 Review process by the Commission**

The review process has been conducted in accordance with Part IV, sections 20B–20D of the ***National Parks and Wildlife Act 1970***.

Copies of the representations and the Director's report were available for public inspection at the Commission's Office in Hobart and Launceston, and at the Dorset Council Chambers, Scottsdale. The representations and report were exhibited for 14 days from 24 June 2002.

The Commission determined that a hearing was not required to assist in the review of the representations. In accordance with section 20B of the ***National Parks and Wildlife Act 1970*** the Commission has given written notice of its decision not to hold a hearing to the Director, the Minister and each person who made a representation.

#### **1.3.1 Commission reports to the Minister**

The Minister must consider the report of the Commission before the Plan is submitted to the Governor for approval under s.19 of the ***National Parks and Wildlife Act 1970***. Section 20E(3) of the Act provides that a management plan submitted to the Governor can either be unaltered or contain alterations that the Minister thinks appropriate having regard to the Commission's report, the representations (including any representations from National Parks and Wildlife Advisory Council) and the Director's report.

## **2.0 Review of representations and Director's report**

### **2.1 Introduction**

The Commission has considered all representations made in relation to the Draft Plan and based its conclusions and recommendations upon these representations and the Director's report (refer to Appendix 2). Representations were generally positive and supportive of the Draft Plan, with issues of concern directed at several specific areas.

The Director's report (dated 3 December 2001) identifies four major areas within the Draft Plan that attracted comment in representations:

- management of fisheries;
- Ramsar wetland management;
- water management; and
- vehicle use and beach access.

Sections 2.2 to 2.4 of this review examine the issues raised in representations in the context of these areas. Sections 2.5 to 2.12 examine the issues raised regarding Aboriginal heritage, camping, fire management, shacks, horse riding, boating access, resourcing and management zones.

Factual corrections to text in the Draft Plan, provided by representors and accepted by the Director, are endorsed by the Commission unless otherwise stated.

### **2.2 Management of fisheries**

Section 5.6 of the Draft Plan deals specifically with fishing. Other sections of the Draft Plan relating to fishery management are Sections 4.2 (Introduced Fauna), where it is noted that trout are an introduced species in the reserve and 4.6 (Leases, Licences, Written Authorities), which addresses eel fishing.

#### **2.2.1 Stocking lakes with exotic fish species**

##### ***Representations***

The issue of stocking the lakes within the reserve with introduced species such as brown and rainbow trout was raised in several representations (refer to the 3<sup>rd</sup> dot point prescription in Section 5.6 (Fishing)). Two opposing views were presented on this issue. One view supported stocking lakes in the reserve with brown and rainbow trout. However, the World Wide Fund for Nature Australia is opposed to stocking exotic species of trout in Little Waterhouse Lake because it is a

Ramsar listed wetland, and stocking trout is inconsistent with the aims of Section 4.2 (Introduced Fauna) of the Draft Plan. The Fund state that advice received from DPIWE officers is that:

***“...the trout will not reproduce in a confined lake, needing a free-flowing stream in which to spawn, hence the need for ongoing stocking of the lake. It is therefore recommended that existing individuals be fished out or allowed to die through natural attrition.”***

The Fund recommends that no exotic species of trout be stocked in Little Waterhouse Lake and that the impact of trout fishing in Blackmans Lagoon be researched. The National Parks and Wildlife Advisory Council (NPWAC) note that the practice of stocking lakes within the reserve with trout appears to be long established. However, NPWAC questioned the extent to which the Parks and Wildlife Service (PWS) and the Inland Fisheries Service (IFS) have discussed strategic policy on this issue. Environment Australia comment that the plan should contain management prescriptions to monitor or assess the potential impacts of the trout fishery. Another representation was strongly opposed to stocking the water bodies with trout primarily because of the threat to endangered species such as the green and gold frog.

The IFS advise that the water bodies in the reserve have previously been stocked with brown, rainbow and brook trout; and Atlantic salmon and brown trout/Atlantic salmon hybrids. The IFS do not support the 3<sup>rd</sup> dot point prescription in Section 5.6 (Fishing) of the Draft Plan, which restricts recreational fish species that may be used to stock the reserve to brown and rainbow trout.

The IFS representation states:

***“...it is our requirement that the species of fish to be stocked for recreational purposes in these lakes, including Little Waterhouse, will include salmonids and hybrids thereof. ...***

***I am of the opinion that the Service’s stance on these issues is not detrimental to the values of these waters and is consistent with the historical use and contemporary community requirements.”***

### **Director’s response**

The Director’s report notes that the IFS supports continued recreational fishing (including bait fishing) and stocking of water bodies in conservation areas and other reserved land. The ***Inland Fisheries Act 1995*** enables the IFS to introduce recreational fish species into the freshwater wetlands of the reserve, unless this statutory power is restricted, with the agreement of the IFS, by a management plan. The report states that the IFS has indicated to PWS that it will not accept such a restriction. The report comments that there is no evidence that trout are impacting on species such as the green and gold frog, stating that ***“The healthy population of green and gold frog in Blackmans Lagoon would suggest that the two species can co-exist.”***

The Director recommends that the environmental impact of the trout fishery be assessed and monitored. It is suggested that this may be achieved through the Regional Fishery Management Plan to be prepared by the IFS.

Use of bait, other than mudeyes and wattlegrubs, is not supported by the Director because of the risk of introducing disease. For example, worms can carry ***Phytophthora***.

### **Director's proposed changes (extracted from the Director's report)**

It is proposed to amend the plan to re-word the second prescription dot point under Section 5.6 (Fishing) which refers to what fish species can be used to re-stock the lakes of the reserve.

- Brown and rainbow trout, salmon and salmon hybrids may be used to stock the lakes within the reserve and is to be carried out under the strict supervision of the Inland Fisheries Service.

It is proposed to add a new prescription under Section 3.5 (Wetlands) and Section 5.6 (Fishing) to provide for continuing liaison with Inland Fisheries with respect to assessment and monitoring of potential impacts:

- Liaise with and support the Inland Fisheries Service with regard to assessment and monitoring of potential environmental impacts of the trout and salmon fishery in the reserve.

### **Commission commentary and recommendations**

It is acknowledged that the management of fisheries is a sensitive issue affecting a number of stakeholders and users of the reserve. Therefore management of fisheries needs to be carefully balanced to ensure that the management objectives for a conservation area are achieved. (Refer to Appendix 3 for the objectives for management of a conservation area.)

Two management objectives for a conservation area are particularly relevant to this issue. One objective provides for protection against adverse impacts of introduced species, while another objective is to encourage appropriate recreational use and enjoyment consistent with the conservation of the conservation area's natural and cultural values.

The Commission accepts the Director's advice that there is no evidence of trout causing an adverse impact on threatened species in or around the lakes, and the fact that the lakes have been stocked with exotic fish species for a number of years. People have been visiting the Waterhouse Conservation Area, to engage in recreational fishing, for a number of years. On balance, the Commission considers that continuing to stock the lakes with the same fish species is an acceptable practice. However, it is essential that provision be made for monitoring and assessment of any environmental impacts from either the trout or salmon fisheries. This is particularly important for Little Waterhouse Lake, given its status as a wetland of international importance, and is strongly recommended by Environment Australia (see section 2.3.2 of this report for discussion on the Ramsar wetland).

As key managers of the reserve, DPIWE and the IFS need to work closely together in the implementation of this Plan and the development of the regional fishery management plan. The Commission recommends that preparation of the regional fishery management plan be given priority by the IFS. If this plan is not given priority monitoring and assessment processes will not be developed and implemented for an indefinite period of time. It is considered that such an approach would be unsatisfactory, particularly for Little Waterhouse Lake.

The Commission supports the Director's proposed changes and recommends that the Draft Plan be amended accordingly.

## 2.2.2 Bait fishing

### **Representations**

Representations from the Flyfishers' Club of Tasmania Inc and the Freshwater Angler's Council of Tasmania expressed concern about the 4<sup>th</sup> dot point prescription in Section 5.6 (Fishing). This prescription states that bait fishing and bait collection within the reserve is restricted to written authority holders. Representations were opposed to individual bait anglers being required to obtain written authority. These representations sought a 'blanket' or 'block' permit for any bait fishing anglers. Restrictions on the type of bait that can be used or collected in the reserve was also raised. Concern was expressed about bringing mudeyes into the reserve and the potential to introduce species to the reserve. The Freshwater Angler's Council of Tasmania sought clarification from the IFS on species that can be brought into the reserve. The Angler's Council state:

***"We believe that worms, grasshoppers and cockroaches should be added to the list of allowed baits. It is our firm belief, and with no scientific evidence to the contrary, that these species would have no effect on the environment or the balance thereof."***

The IFS also oppose the prescription restricting bait fishing because:

- 1) ***The current regulations ban the use of frogs and any fish species as bait. This leaves mudeyes, wattle grubs, and worms as the primary types of bait. Except for worms, these baits are unlikely to cause a significant impact to flora and fauna.***
- 2) ***The issuing of individual permits for permission to bait-fish is bureaucratically excessive.***
- 3) ***Traditionally, the majority of anglers who fish these waters do so using bait irrespective of whether they require a permit or not."***

The IFS propose a general exemption, permitting bait fishing at Blackmans Lagoon and Little and Big Waterhouse Lakes, with restrictions on bait as per the Draft Plan.

The issue of how the use of bait within the reserve will be monitored and regulated was also raised.

### **Director's response**

The Director's report notes that this issue has been the subject of community consultation and discussion with major stakeholders during preparation of the Draft Plan. During the consultation process it was agreed that to be consistent with the ***National Parks and Reserved Land Regulations 1999***, which restrict the collection and use of bait, bait would be limited to mudeyes and wattle grubs, and a written authority system would be implemented. The written authority system has been operating since 1999.

A blanket authority permitting bait fishing is not opposed by the Director. However, the Director notes the significance of Little Waterhouse Lake as a Ramsar wetland and the statutory obligations that arise from the Lake's Ramsar status. The Ramsar status is identified as the most important argument for retaining individual written authorities. Close regulation ensures that the risk of introducing invasive species is minimal.

The Director notes the request for a general authority from the IFS and two fishing groups and proposes the following changes.

### **Director's proposed changes (extracted from the Director's report)**

It is proposed to delete the prescription referred to and insert three new prescriptions under Section 5.6 (Fishing) which now reads:

- A general authority is granted to bait fish at Blackmans Lagoon, Little Waterhouse and Big Waterhouse Lakes, using specified bait.
- Bait fishing and bait collection is limited to the use of:
  - mudeyes' (dragonfly larvae), brought in or collected on site, and
  - Wattle grubs, brought in from outside the reserve.
- PWS will liaise with and assist IFS in managing the impacts of bait fishing in the reserve, including the provision of information to anglers about acceptable bait and other requirements of the management plan and the monitoring of angler pressure on the lakes, particularly Little Waterhouse Lake.

### **Commission commentary and recommendations**

The Commission agrees with the IFS and fishing groups that the prescription requiring an individual written authority to bait fish in the reserve is onerous. However, it is essential that bait fishers are fully informed of the restrictions on bait that can be used in the reserve, and the reasons why other bait cannot be brought into the reserve. The Commission fully supports the Director's proposed change in this regard. The proposed prescription requiring monitoring of angler pressure on the lakes, particularly Little Waterhouse Lake, is considered essential and is also supported.

Mudeyes and wattle grubs have not been identified as invasive species that are harmful to the wetland, however, it would be preferable if there was scientific evidence to support this conclusion. This is particularly so for Little Waterhouse Lake, given its Ramsar listing status (refer to section 2.3.2 of this report for discussion on the Ramsar wetland).

The Commission supports the Director's proposed changes and recommends that the Draft Plan be amended accordingly.

### **2.2.3 Eel netting**

#### **Representations**

The World Wide Fund for Nature Australia submit that the practice of eel re-stocking in Little Waterhouse Lake should cease. The basis for this submission was the commentary in Section 4.6 (Leases, Licences and Authorities) of the Draft Plan, which acknowledges that the impact of commercial eel fishing in the reserve "**...is poorly researched and understood.**"

The Fund also raised the issue of species other than eels being caught in eel nets and the impact of higher than natural numbers of eels in the reserve on other species. The Fund is of the view that if eel fishing is to continue then the impact of re-stocking must be researched, not only for Little Waterhouse Lake, but also Blackmans Lagoon, which has national status as a wetland of significance.

The representation from the IFS states that an eel fishery management plan for the Waterhouse Conservation Area should be prepared within the overall framework of the freshwater fishery management plans. Eel fishery management plans do not currently exist, however eel fishers are required to obtain a licence, which sets out conditions. IFS do not support a management plan for a reserve containing the level of detail on eel fishing that will eventually be contained in an eel fishery management plan. The IFS submit that the current eel fisher should be permitted to continue to fish under the conditions of the current permit. The IFS state that the present permit “...provides for due protection of the eel resource and other in-stream fauna.”

The IFS recommend that the statement “...eel fishing has resulted in a significant by-catch of platypus, usually resulting in death of these animals” be omitted unless there is evidence to support the statement. Conditions of eel fishing licences include specifications for platypus exclusion screens over the opening of eel nets. These screens allow air-breathing fauna (including platypus) to breathe until released.

Environment Australia comment that the Draft Plan does not adequately address the potential impacts from the practice of eeling.

### **Director’s response**

The Director’s report notes that the operation of an eel fishery in the reserve is consistent with small-scale resource use, which is a management objective for a conservation area. However the report also recommends that the Draft Plan should be amended to require an investigation of the impact of stocking the lake with eels. The report also proposes prohibiting the use of eel nets that are not fitted with a screen or set with a raised cod-end.

### **Director’s proposed changes (extracted from the Director’s report)**

It is proposed to re-word the text under Section 4.6 (Leases, Licences and Authorities) referring to platypus bycatch from:

In the past eel fishing has resulted in a significant by-catch of platypus, usually resulting in death of these animals to:

In the past, eel fishing at other locations around the State has resulted in a by-catch of platypus, usually resulting in the death of these animals. Platypus have not been recorded in the reserve, but they have been recorded in streams close by.

### **Amended Prescriptions from Section 4.6**

- The continued conduct of any commercial eel fishery within the Waterhouse Conservation Area will be subject to a regional fishery management plan when it is developed, until then the conditions of the current licence will continue to apply.
- To prevent the inadvertent drowning of platypus or other species, only eel nets fitted with a screen or set

with a raised cod-end may be used in the reserve.

### **Commission commentary and recommendations**

It is clearly acknowledged in the Draft Plan that little is known about the impact of an eel fishery in the reserve. Whilst a management objective for a conservation area is to provide for the controlled use of natural resources, an activity should not be permitted if it is not sustainable, or if it has an adverse impact on the values within the reserve.

The Director's report indicates that the impact of supplementing the eel population to sustain the eel fishery will be considered during the preparation of the regional fishery management plan and the eel fishery management plan. These plans are being prepared by the IFS. The Draft Plan states that no eel re-stocking will occur within the reserve unless authorised by the eel fishery management plan. The Commission considers that if eel re-stocking is to be contemplated by the IFS then a scientifically acceptable monitoring and assessment program should be developed and implemented to determine any environmental impacts of eel re-stocking, and an eel fishery generally, before a decision is made to authorise eel re-stocking. If a monitoring and assessment program is not possible due to lack of resources, it is strongly recommended that eel re-stocking not be permitted under the eel fishery management plan, particularly in Little Waterhouse Lake. It should also be noted that eel re-stocking in Little Waterhouse Lake may be an action requiring assessment under the **Environment Protection and Biodiversity Conservation Act 1999** (EPBC Act).

The Commission agrees with the submission from the IFS that the current eel fishery licence conditions should continue to apply, and not be changed via the management plan. However, the Commission considers that it is important, from a public information perspective, that the management plan prescriptions mirror the licence conditions regarding the type of eel nets that can be used, such as platypus exclusion screens.

The Commission considers that the changes proposed by the Director adequately respond to the issues raised in the representations and recommends that the Draft Plan be amended accordingly.

## **2.3 Wetland management**

Section 3.5 (Wetlands) describes the wetland area generally within the reserve. The section specifically acknowledges the Ramsar listing of Little Waterhouse Lake and its status as an internationally significant wetland.

### **2.3.1 Water extraction**

#### **Representations**

Several representations were concerned about water being pumped from Blackmans Lagoon for irrigation purposes. The issue of monitoring extraction rates was raised, and in particular responsibility for monitoring, and whether a mechanism exists to enable reduction of the extraction rate during dry periods. The World Wide Fund for Nature Australia recommended that a prescription be included in the Draft Plan prohibiting extraction of water from Little and Big Waterhouse Lakes.

### **Director's response**

The Director advises that water currently pumped from Blackmans Lagoon is for domestic and agricultural purposes, not for pasture irrigation. Further, the Director advises that “**The volume and purpose for which water can be extracted for riparian water entitlements are provided under the Water Management Act 1999.**” This Act does not automatically confer rights over a riparian Crown reserve such as Waterhouse Conservation Area. Where a reserve exists an easement or licence to take water may be granted by the Secretary of DPIWE under the **Crown Lands Act 1976**. The Director indicates that the granting of an easement or licence to take water is a ‘statutory power’ within the meaning of section 24(1) of the **National Parks and Wildlife Act 1970**. This means that under the management plan the statutory power can be restricted, provided the body administering the legislation is in agreement. The Director considers that any application to extract water from Little Waterhouse Lake would require an assessment under the EPBC Act due to the Ramsar status of that Lake.

### **Director's proposed changes (extracted from the Director's report)**

It is proposed that the following policy from Section 3.5 (Wetlands): “Monitor the pumping of water from the lakes of the reserve to ensure common law water rights are not exceeded” be re-worded as follows;

- Ensure that relevant water users are adhering to the requirements of the **Water Management Act 1999** in their use of water from Blackmans Lagoon.
- Any applications for licences to extract water for commercial purposes from lakes in the reserve would be assessed taking into account the environmental values and significance of the reserve and would not normally be approved.

### **Commission commentary and recommendations**

Water extraction must comply with the **Water Management Act 1999**. For Little Waterhouse Lake, a licence to extract water would require an assessment under the Commonwealth EPBC Act. The Commission notes the Director's advice that water currently pumped from Blackmans Lagoon is for domestic and agricultural purposes, not for pasture irrigation. The Commission is satisfied that existing legislation controls the extraction of water. The Commission considers that the changes proposed by the Director clarify the existing statutory requirements and recommend that the Draft Plan be amended accordingly.

#### **2.3.2 Ramsar wetland – Little Waterhouse Lake**

##### **Representations**

Policy dot point 3 (Section 3.5 (Wetlands)), which reads “**Assess, and if appropriate, prepare a recommendation to alter the Ramsar listing of Little Waterhouse Lake, revising the criteria used to list the wetland.**”, was opposed by several representors. The World Wide Fund for Nature Australia note that the State alone cannot change the boundaries of the Little Waterhouse Ramsar site. The management prescriptions in the Draft Plan must accord with the Lake's nomination as a Ramsar site. It is considered that the Draft Plan implies that the conservation status of Little Waterhouse Lake might be reduced. Such an inference should not be in the Draft Plan.

The representation from Environment Australia drew attention to a number of deficiencies in the Draft Plan in terms of detailed information about the Little Waterhouse Lake Ramsar site and proposed management of the site. Environment Australia also note that the Draft Plan must make reference to the EPBC Act, and in particular those provisions that relate to protection and management of Ramsar wetlands (including threatened and migratory species). In addition Environment Australia note that the EPBC Act provides a framework for managing Ramsar wetlands through the Australian Ramsar Management Principles. Environment Australia observe that:

***“The Act provides for the implementation of the Australian Ramsar Management Principles through: bilateral agreements; accredited management plans; Commonwealth Ramsar management plans and Ramsar management plans prepared in cooperation with the States and Territories.”***

A detailed assessment of the Draft Plan against the Australian Ramsar Management Principles is provided by Environment Australia.

Environment Australia and NPWAC recommend that an implementation schedule be devised to facilitate implementation of the Plan.

The World Wide Fund for Nature Australia note that Blackmans Lagoon is of national significance and is listed in ‘A Directory of Important Wetlands in Australia’. The Fund submit that the Draft Plan should recognise the national significance of Blackmans Lagoon and management strategies be implemented. The Fund also comment that Big Waterhouse Lake is a wetland of similar significance to Blackmans Lagoon, however, it is not listed in the Directory.

### ***Director’s response***

The Director referred to one of the criteria used to list Little Waterhouse Lake. The criteria is:

- “it is a particularly good representative example of a natural or near-natural wetland, common to more than one biogeographical region.”

The rationale for inclusion of policy dot point 3 is explained on the basis that the criteria (referred to above) used to list Little Waterhouse Lake is no longer accurate given that the wetland has been modified through human activities. For example:

- much of the land surrounding the wetland has been cleared;
- water flowing into the wetland drains from agricultural land;
- shacks are sited on the shore of the Lake;
- the Lake has been modified through construction of an earthen wall which acts as a dam; and
- a ford has been built downstream of the Lake for fire management purposes.

However, the Director acknowledges that the modifications were made prior to the Lake’s listing under the Ramsar Convention and now proposes that the original criteria be retained and Policy dot point three be deleted.

The Director accepts Environment Australia's recommendation that policies and management prescriptions addressing the significance, protection and management of the Ramsar site be grouped under one heading. It is proposed to draw all policies and prescriptions which specifically relate to the Ramsar site under Section 3.5 (Wetlands). It is also proposed that a comprehensive description of the Ramsar site - Ramsar Information Sheet for Little Waterhouse Lake - be included as an Appendix to the Plan. A detailed map showing the boundaries of the Ramsar site will also be included as an Appendix to the Plan.

It is proposed to include a schedule, as an Appendix to the Plan, setting out implementation priorities. The suggestion by Environment Australia to include timeframes for completion of each action and identifying who will be responsible for undertaking the action is not accepted by the Director. The Director states that "**Timeframes and responsibilities are operational matters reliant on available resources to implement and are dealt with in subsequent operational planning.**"

The Director accepts Environment Australia's recommendation that the Plan refer to the EPBC Act and its relevance to Ramsar wetlands in terms of management and environmental assessment and approval requirements.

The Director acknowledges that Blackmans Lagoon is a wetland of national significance and recommends that the Plan be amended accordingly.

One new aim and two new policies are proposed regarding management of the Ramsar wetland.

### **Director's proposed changes (extracted from the Director's report)**

#### New Aim

- Work with landowners and other State agencies to minimise impacts on the wetlands where possible.

#### New Policies

- Any action which has, will have, or is likely to have a significant impact on the ecological character of the Little Waterhouse Lake Ramsar Wetland, will be referred to the Commonwealth Minister for Environment and Heritage to determine whether the action is subject to the Commonwealth **Environment Protection and Biodiversity Conservation Act 1999** (EPBC Act).
- Continue to liaise with the Inland Fisheries Service with respect to the release of recreational fish species into the wetlands of the reserve.

It is proposed that a new section be added to the plan as part of Section 3.5 which lists the prescriptions which specifically relate to the management of the Ramsar wetland in accordance with the suggestion of Environment Australia. The suggested text follows below:

### **Ramsar Wetland Management**

Little Waterhouse Lake and its surrounding area has been included in a Natural Zone (see Section 2.3 and Map 3). Prescriptions throughout the plan relating to the management of Little Waterhouse Lake are listed below.

#### Prescriptions

- Encourage the removal of existing development in the Natural Zone (see Section 2.3).

- Except for natural or cultural protection works, exclude other types of development, including visitor or private buildings or other structures and facilities (see Section 2.3).
- Survey and monitor water bodies in the conservation area and catchment to establish baseline information; identify environmental water requirements and identify changes that might threaten the ecological character of wetlands in the reserve (see Section 3.2).
- Liaise with other relevant agencies and neighbouring landowners to develop and implement strategies (such as buffer zones along watercourses) to reduce runoff of sediment, pesticides and fertilisers (see Section 3.2).
- Priority will be given to weed management strategies around Little Waterhouse Lake (see Section 4.4).
- The continued conduct of any commercial eel fishery within the Waterhouse Conservation Area will be subject to a regional fishery management plan when it is developed, until then the conditions of the current licence will continue to apply (see Section 4.6).
- No eel restocking will occur within the reserve unless authorised under an approved fishery management plan (see Section 4.6).
- To prevent the inadvertent drowning of platypus or other species, only eel nets fitted with a screen or set with a raised cod-end may be used in the reserve (see Section 4.6).
- Stakes used for eel netting will be removed at the completion of each season (see Section 4.6).
- Monitor Little Waterhouse Lake for human impacts and, where necessary, implement preventative or remedial actions (see Section 5.1).
- All fish stocking within the reserve is to be carried out under the strict supervision of the Inland Fisheries Service (see Section 5.6).
- Bait fishing in Little Waterhouse Lake will continue to be subject to a general authority (see Section 5.6).
- Bait fishing and bait collection is limited to the use of:
  - mudeyes' (dragonfly larvae), brought in or collected on site, and
  - Wattle grubs, brought in from outside the reserve.
- PWS will liaise with and assist IFS in managing the impacts of bait fishing in the reserve, including the provision of information to anglers about acceptable bait and other requirements of the management plan and the monitoring of angler pressure on the lakes, particularly Little Waterhouse Lake.
- Proposals for manipulative changes to fish habitat including drainage changes and the damming of flood affected lakes will be assessed according to the procedures established in Section 4.9 (see Section 5.6).
- Liaise with the Inland Fisheries Service on the dissemination of information to fishers (see Section 5.6).
- Prepare and disseminate information for local fishers publicising the changes to fishing regulations within the conservation area (see Section 5.6).

- Educate fishers about the environmental impacts of bait fishing and benefits of using lures (see Section 5.6).
- Encourage a more strategic and informed basis for restocking the lakes of the reserve (see Section 5.6).
- In recognition of its Ramsar status, as well as the need for a well distributed sanctuary system within Tasmania to provide for sustainable duck hunting, the taking of duck on Little Waterhouse Lake is prohibited (see Section 5.7).
- All duck hunting hides on Little Waterhouse Lake will be removed (see Section 5.7).
- The use of boats on Little Waterhouse Lake is restricted to un-powered vessels or vessels powered by electric motors with a maximum speed of 5 knots (see Section 5.8).

### **Commission commentary and recommendations**

The international significance of Little Waterhouse Lake as a Ramsar listed site has been understated in the Draft Plan. This issue was raised by a number of representations, including Environment Australia (Wetlands Program). The Director has responded to the issues raised and proposed a new Aim, two new Policies, and the drawing together of all prescriptions that are relevant to the management of the wetland.

Division 2, Managing wetlands of international importance, Chapter 5 of Part 15 of the Commonwealth EPBC Act establishes, amongst other things, that the Commonwealth must try to prepare and implement management plans for wetlands listed under the Ramsar Convention that are not in Commonwealth areas. The preparation of such plans must be in co-operation with the relevant States and Territories. The EPBC Act provides for regulations prescribing principles for the management of wetlands. These principles are known as the Australian Ramsar Management Principles.

Schedule 6, Managing wetlands of international importance, of the **EPBC Regulations 2000** sets out the general principles of wetland management (see Appendix 4 for a copy of Schedule 6 of the **EPBC Regulations 2000**). The primary purpose of management of a declared Ramsar wetland must be in accordance with the Ramsar Convention.

The Commission considers that the Draft Plan, as amended by the Director's proposed changes, will adequately describe the ecological character of the Ramsar site. While the Draft Plan includes a description of the characteristics that make Little Waterhouse Lake a wetland of international significance, the inclusion in Appendices of the Ramsar Information Sheet for Little Waterhouse Lake Ramsar Wetland, and a map showing the boundaries of the wetland, will provide additional detailed description.

The Director's proposal to include an Appendix to the Plan setting out implementation priorities is supported. The Commission agrees that day to day operational management should not be included in a management plan.

The proposal by the Director to group all policies and prescriptions that relate specifically to the Ramsar wetland under Section 3.5 (Wetlands) is supported. Such an approach assists the reader identify all the policies and prescriptions that apply to the Ramsar wetland. It also clarifies what is proposed in terms of action required to maintain the wetland's ecological character.

The assessment by Environment Australia of the Draft Plan against the Australian Ramsar Management Principles identified a number of deficiencies in the Draft Plan. However, it should be acknowledged that the Draft Plan was prepared before the EPBC Act and the EPBC Regulations commenced. The principles for wetland management (Schedule 6, *EPBC Regulations 2000*) provide useful guidance in the preparation of a management plan. However, the degree to which a management plan can address certain issues will vary according to the nature and location of the wetland, the pre-existing and existing use of the wetland and the ability of the State to resource monitoring and research programs.

Environment Australia comment that the Draft Plan should address the maintenance of the hydrological integrity of the Ramsar site. In response, the Director has proposed a re-worded prescription:

- Liaise with other relevant agencies and neighbouring landowners to develop and implement strategies (such as buffer zones along watercourses) to reduce runoff of sediment, pesticides and fertilisers (see Section 3.2).

The Commission supports the proposed prescription. It is recommended that dot point four under the heading Prescriptions in Section 3.2 (Water Quality) also be included in this section to strengthen the need for an integrated approach to catchment management.

The Commission is satisfied that zoning the Ramsar site 'Natural' is appropriate. The zoning will promote the Ramsar site's conservation and sustainable use for the benefit of humanity in a way that is compatible with maintenance of the natural properties of the ecosystem.

Dune movement and breaks, and the risk of physical loss, modification or encroachment on the wetland, is discussed in the Draft Plan. However no policies or prescriptions are provided to deal with this impact, which may endanger the wetland's ecological character. This may be because the only information about dune movement and breaks, in relation to the Ramsar site, is anecdotal. It is suggested that a prescription be included in the Ramsar wetland management section as follows:

- **Assess the stability of dunes and the earthen wall that dams Little Waterhouse Lake, and undertake restoration or rehabilitation activities, if required. (see Section 3.2).**

The proposed changes to the Draft Plan, providing for the inclusion of prescriptions to address potential impacts of the trout and salmon fishery, provide an appropriate mechanism to identify any adverse impacts from this fishery.

There are a number of monitoring programs in the Draft Plan, or proposed to be included in the Draft Plan. The Commission supports all proposed monitoring programs, which will provide valuable information on the state of the ecological character of the Ramsar wetland. However, these monitoring programs must be resourced and implemented, otherwise the State and Commonwealth Governments may not be fulfilling their statutory obligations under the EPBC Act.

The Commission supports the deletion of the 3<sup>rd</sup> dot point Policy to "Assess, and if appropriate, prepare a recommendation to alter the Ramsar listing of Little Waterhouse Lake, revising the criteria used to list the wetland." It is recommended that a new Aim be included:

**“- to update the Ramsar Information Sheet for the Little Waterhouse Lake Ramsar Wetland to include a more comprehensive description of the Lake and the ecological values for which it was listed.”**

The Commission recommends that the Aims for managing wetlands should be expanded to reflect the general principles of wetland management prescribed in the *EPBC Regulations 2000*.

In addition to the Director’s list of proposed combined prescriptions, the Commission recommends that the following prescription be included:

- Liaise with and support the Inland Fisheries Service with regard to assessment and monitoring of potential environmental impacts of the trout and salmon fishery in the reserve.

This prescription is proposed by the Director to be included in Section 5.6 (Fishing) (see section 2.1.2 above).

The Commission considers that the public consultation process for the preparation and review of the Draft Plan has been suitable, and enabled members of the community and stakeholders to contribute to the content of the Draft Plan.

On page ii of the Draft Plan it is stated that the Plan will be reviewed 10 years after approval by the Governor. Under the Australian Ramsar Management Principles a management plan should be reviewed at intervals of not more than 7 years. It is recommended that the Draft Plan also be reviewed 7 years after approval by the Governor, in recognition of the Ramsar wetland status of Little Waterhouse Lake.

PWS has consulted Environment Australia on the Director’s proposed changes to the Draft Plan. A letter, dated 30 July 2002, from Environment Australia states:

**“We are satisfied that the comments provided by Environment Australia have been considered and will be reflected in the final draft of the management plan. I suggest that in the proposed new section (3.5) relating to the Ramsar management obligations, a statement be included noting that the plan has been developed in accordance with Australia’s Ramsar Management Principles.”**

The Commission agrees with Environment Australia’s suggestion and recommends that Section 3.5 (Wetlands) include a statement that the plan has been developed in accordance with Australia’s Ramsar Management Principles.

### **2.3.3 Dune stabilisation and rehabilitation**

#### **Representations**

The World Wide Fund for Nature Australia suggest that remedial action be taken to halt the movement of the sand dune into Big Waterhouse Lake. The Fund suggest that stabilisation through vegetation cover should be considered, including the use of exotic plant species, given the seriousness of the problem. Mr Stuart Campbell gave a historical perspective of the cause of mobile sand dunes – sheep and cattle grazing for over 100 years. Mr Campbell put the case for using marram grass to stabilise the dunes as quickly as possible. Once the dunes are stabilised, native species colonise the dune, and marram grass recedes. However, another representor recommended that plants such as spinifex, pigface and other native coastal plants be investigated for their

suitability in landscaping or rehabilitation, in preference to marram grass. It was urged that exotic species not be used for dune stabilisation.

### **Director's response**

The Director considers that the Draft Plan does not preclude remedial action being undertaken to prevent the mobile dune infill of Big Waterhouse Lake. The Director comments that DPIWE has a policy of not using introduced species for dune stabilisation works. Therefore, no change is proposed.

### **Commission commentary and recommendations**

The Commission agrees with the Director that the Draft Plan does not prevent remedial dune stabilisation taking place. It is considered that this issue has been adequately addressed in Section 3.1 (Geodiversity). No change to the Draft Plan is recommended. It is noted that DPIWE has a policy not to use introduced species for stabilisation works.

## **2.4 Vehicle use and beach access**

Section 5.4 (Vehicle Use and Access) of the Draft Plan deals specifically with vehicle use and access issues.

### **Representations**

Representations raising this issue were either concerned about the impact of vehicles on birds and other fauna, or about restrictions being placed on off-road vehicle use.

Birds Australia queried whether a fee will be charged for written authorities to operate vehicles within the reserve, and under what circumstances an authority would be revoked, and whether there will be a limit on the number of permits issued. It was submitted that opening beaches to vehicles could lead to damage spreading beyond the reserve.

The point was made that policing the use of motor bikes and four wheelers is required as some drivers pose a danger to other recreational users.

The IFS submit that restrictions on access to the far shore of Blackmans Lagoon would prevent many anglers from fishing that part of the Lagoon. It was suggested that “...**access could be restricted to day-use only in areas outside defined camping zones, with access tracks re-routed or upgraded to avoid erosion problems.**”

The World Wide Fund for Nature Australia support the prescriptions in Section 5.4 (Vehicle use and access). The Fund recommend that the area at the end of the track along Little Waterhouse Lake, where the last shack is located, be fenced to prevent vehicle access into the wetland.

One representation sought assistance for people who are disabled or elderly and can only access areas by vehicle.

Another representation states that his family constructed the track to South Croppies Point and suggests that the track be named ‘Dolley’s Track’.

The Tasmanian Aboriginal Land Council (TALC) state that the impact of vehicles on Aboriginal heritage sites has not been surveyed or researched, and the current impact should be monitored. TALC submit that:

***“Any tracks that impact on Aboriginal sites ... should be closed and rehabilitated in co-operation with the Aboriginal Heritage Section of the Department of Primary Industry Water and Environment and the Tasmanian Aboriginal Land Council.”***

It is TALC's view that vehicles should only be permitted access to the beach for boating and emergency purposes. TALC submit that people obtaining permits to use off-road vehicles should be informed of the provisions of the ***Aboriginal Relics Act 1975***.

The Tasmanian Recreational Vehicle Association Inc (TRVA) consider that a more effective method of protecting sensitive areas, such as bird rookeries, is to selectively fence those areas, rather than closing off the whole area. TRVA ***“...believe closing off areas only antagonise the situation and thus causes more damage through inappropriate use of the area.”*** This representation suggests trialing the reserve as an un-restricted multiuse area, with flora and fauna protection.

The TRVA object to the Aim of closing access to areas where further use may cause unacceptable damage to other values within the reserve. Their view is that decisions about closing access to areas should be undertaken in consultation with all users of the area. It was also noted that the 'Policy for the Use of Recreational Vehicles on State Owned Land in Tasmania' provides for consultation before closure of tracks. The TRVA state they ***“...fully support and are willing to work in conjunction with Parks to the rationalization of all tracks in the area.”***

Self-regulation is the TRVA's preferred approach to control of vehicle use on beaches. A general authority to drive on beaches is supported. The TRVA suggest making a non-sensitive dune available for recreational use, ***“...thus removing the temptation of driving on sensitive dunes.”***

### **Director's response**

The Draft Plan permits visitors to use vehicles off-road on:

1. Waterhouse Beach from the ocean end of the Blackmans Lagoon Track to the southern limit of the reserve,
2. West Tomahawk Beach from the boat launching site at the end of Homestead Road to West Wyambi Road, and
3. at authorised boat launching sites.

The Director reports that:

***“These routes were negotiated with recreational users groups in an attempt to find an appropriate balance between conservation and recreation. Neither of the beaches available for recreational vehicles is believed to support good habitat for nesting shorebirds. Areas that are more sensitive as bird habitat are not available for off-road vehicle use in the management plan.”***

The TRVA's suggestion of setting aside a non-sensitive dune area for recreational use has been considered by PWS, however no suitable areas have been identified. The observation is made that

this is probably an issue that needs to be considered at a regional level, rather than specifically for this reserve.

The Director considers that the Draft Plan contains prescriptions that relate to a recent Aboriginal heritage assessment of tracks in the reserve, therefore, no change is proposed.

The Director accepts that there may be special circumstances where the issuing of an individual authority for special, limited and conditional use of recreational vehicles on non-designated routes is appropriate.

### **Proposed Change**

To meet the needs of disabled users it is proposed that the following prescription be inserted under Section 5.4 (Vehicle Use and Access) to read as follows:

- The Parks and Wildlife Service will have the discretion to issue individual authorities for special, limited and conditional use of recreational vehicles on non-designated routes.

### **Commission commentary and recommendations**

The Commission considers that there has been considerable consultation and negotiation with users of the reserve and PWS in preparing Section 5.4 of the Draft Plan. Where there are competing interests for the use of a resource conflicts can occur. However, in this instance, the Commission considers that a balanced approach has been taken in providing appropriate visitor access to the reserve, access for recreation vehicle users and protection of flora and fauna.

Whilst it is recognised that the Draft Plan contains prescriptions in Section 5.4 (Vehicle Use and Access) regarding protecting Aboriginal sites located on or near tracks, it is considered that the prescriptions should be strengthened. It is recommended that a new prescription be included providing that a program be prepared for the relocation of vehicle routes over Aboriginal sites and alternative routes be identified in consultation with the Aboriginal community and other users.

The Commission supports the change proposed by the Director regarding access for disabled or elderly visitors to the reserve.

## **2.5 Aboriginal heritage**

Section 3.6 (Aboriginal Heritage) specifically addresses this issue. Management issues regarding Aboriginal Heritage are also raised in Section 4.1 (Fire), Section 4.7 (Prospectivity and Mining), and 5.2 (Camping). Aboriginal heritage issues raised in regard to Section 5.4 (Vehicle Use and Access) are discussed in section 2.3 above.

### **Representations**

Representations referring to Aboriginal heritage supported the protection of Aboriginal sites. The Tasmanian Aboriginal Land Council (TALC) raise several issues regarding Aboriginal heritage. The representation suggests that an additional paragraph be included in the Summary Section to indicate that the Aboriginal community continue to use the area. The wording proposed is:

**“Today’s Aboriginal community continue to utilise the area for a number of cultural activities which include visits to the numerous Aboriginal sites in the area, shell collecting for necklaces, departure points for the Aboriginal communitys [sic] ‘Back to the Islands’ trips, educational trips for schools etc”**

Regarding management zones, TALC submit that the Draft Plan should provide for **“Aboriginal cultural use of plants, animals and materials across all zones in a manner consistent with the purposes of the reservation.”**

TALC oppose dot point 6 Prescription in Section 4.1 (Fire Management) because the Aboriginal community do not wish to publicise the location of Aboriginal sites. It is submitted that the PWS rangers have the necessary skills to enable them to identify Aboriginal heritage, and thus avoid damaging Aboriginal sites during fire fighting activities. Consultation is essential and the Aboriginal community should be involved in fire management to ensure that **“...the cultural landscape created by indigenous burning is maintained.”** TALC submit that training and employment opportunities should be provided wherever possible.

TALC make the point that dot point 5 Prescription in Section 4.7 (Prospectivity and Mining), which excludes the coastal strip 100 metres from the high water mark along the reserve coast from all future exploration and mining activities, will not protect Aboriginal sites that are further inland.

TALC state that the majority of camping areas are on Aboriginal sites **“...and are impacting on Aboriginal values.”** New camping areas should be created that do not impact on Aboriginal sites. It is noted that all Aboriginal sites are protected under the **Aboriginal Relics Act 1975.**

It was submitted that Aboriginal rights to use traditional resources must be included and referenced to the **Living Marine Resources Management Act 1995.**

### **Director’s response**

The Director’s report notes that Section 3.7 (Historic Heritage) includes reference to contemporary Aboriginal use of the area under the heading ‘Social Heritage Values’. However, the Director proposes to reword the Summary Section to acknowledge contemporary Aboriginal values.

In response to TALC’s request that management zones provide for Aboriginal cultural use of plants, animals and materials in the reserve, the Director advises that PWS is working on a statewide policy to address this issue. It is recommended that there be no change to the Draft Plan until a statewide policy has been ratified.

The Director accepts TALC’s opposition to Section 4.1 (Fire Management) Prescription dot point 6, which requires preparation of Aboriginal heritage sensitivity zones to aid in fire response, and proposes that the prescription be deleted.

TALC’s comments regarding Aboriginal sites being inland, and therefore not covered by the 100 m buffer prohibiting mineral exploration and mining activities is acknowledged by the Director. However, it is noted that mining and mineral exploration companies are required to comply with the **Aboriginal Relics Act 1975.**

The Director acknowledges that camping areas located on Aboriginal sites are impacting on Aboriginal values, and proposes a modification to the Draft Plan **“...to indicate that values are being damaged and that, in cooperation with users, efforts will be made to avoid or mitigate impacts.”**

### **Commission commentary and recommendations**

Essentially the Commission supports the Director's proposed changes regarding Aboriginal heritage. It is noted that a prescription in Section 5.2 (Camping) requires the closure of several camping areas that are recognised as impacting on Aboriginal values.

The Commission considers that an additional prescription should be included in Section 5.2 (Camping) to ensure that the Aboriginal community is consulted where campsites impact on Aboriginal values. The prescription should provide that where Aboriginal sites are located at or near campsites, consultation with the Aboriginal community shall occur regarding the management of those campsites, preparation of site plans, and the installation of toilets and associated camping facilities. It is further recommended that a prescription be included providing that free range camping shall not be permitted on Aboriginal sites.

## **2.6 Camping**

Camping is specifically addressed in Section 5.2 of Chapter 5 (Visitor Management) of the Draft Plan, while Section 5.1 (Visitors to the Conservation Area) provides general prescriptions for the management of visitors to the reserve.

### **Representations**

One representation requests that a longdrop toilet be provided at Big Waterhouse Lake.

The closure of North Croppies Point to camping is opposed in one representation, stating that the Draft Plan provides no valid reason for the closure.

The prescription prohibiting the discharge of wastes in the reserve is opposed by the Waterhouse Coast Care Group Incorporated. The Group submit that caravans and tents don't have the facilities to have grey water tanks. In any event, the Group submit, grey water is not harmful to the environment. The Group suggest that the prescription should read:

***“Every attempt should be made to take portable toilet waste out of the reserve. If this is not possible or practicable then portable toilet waste should be properly and carefully disposed of in toilets provided by PWS or if no toilets are provided then a hole of suitable depth and size should be dug well away from campsites and material buried.”***

It was submitted that camping should remain free.

A representation from Birds Australia notes that camping has spread recently to the back of Blackmans lagoon, which should be stopped and unofficial tracks closed. This representation supported the prescriptions for camping management provided they are enforced. Birds Australia were concerned about the possible allocation of firewood collection zones in the reserve unless this was very strictly supervised. It is suggested that granting a licence to a commercial vendor may assist resolve the issue, and roadside sales of firewood at Bridport and Gladstone would increase.

The representation from NPWAC generally supports the camping prescriptions. Areas needing further attention are identified as clearer identification of camp sites, booking system in the peak

period, and management of long-term visitors. NPWAC indicate that these are statewide issues, which may be resolved when the Code of Practice (being prepared by PWS) is developed.

### ***Director's response***

In regard to the request for a long drop toilet to be installed at Big Waterhouse Lake, the Director comments that the Draft Plan identifies the need for toilets at the main camping sites, including Big Waterhouse Lake. No change to the Plan is proposed.

The Director advises that one of the objectives of the Draft Plan is to concentrate camping at several camping nodes where facilities can be provided and resources used most efficiently. North Croppies Point is not well used and there are insufficient funds to maintain the campsite in the long term.

In response to the submission opposed to the prohibition of the discharge of toilet waste in the reserve, the Director advises that long drop toilets have been provided at Blackmans Lagoon, two areas at Waterhouse Point and at Ransons Point. When the campsites have been rationalised the issue of waste management can be resolved. Until that time, facilities exist for disposal of sewerage at Scottsdale and St Helens. The Director further advises that the disposal of chemicals used in portable toilets into long drops or pits is unacceptable because of water quality impacts and the risk to human health. The Director considers that it is not unreasonable for visitors, who choose to camp at areas with no facilities for a long period of time, to carry portable toilets and dispose of the waste outside the reserve.

The issue of camping fees is an operational matter beyond the scope of the Draft Plan.

In response to the representation by NPWAC the Director advises that the Draft Plan makes provision for all of the points raised.

### ***Commission commentary and recommendations***

The Commission supports the PWS policy of consolidating campsites within camping nodes, as this will maximise the facilities that can be provided, within the scope of available resources, to the majority of visitors. Scattered campsites are difficult to manage and service, and are resource intensive. It is noted that the provision of toilet facilities at the identified campsites is recognised in the Draft Plan. No change to the Draft Plan is recommended regarding identified campsites or toilet facilities.

The prohibition of discharge of toilet waste in the reserve appears to be necessary until such time as campsites have been rationalised and facilities installed. The Commission considers that provided facilities are available to dispose of toilet waste outside of the reserve, then no change to the Draft Plan should be required.

The Draft Plan does not prescribe camping fees, although fees are to be considered as a revenue raising option. However, by way of observation, the Commission notes that a move toward adoption of the 'user pays' principle suggests the introduction of camping fees is inevitable.

The Commission is satisfied that the issues raised by NPWAC are adequately addressed in the Draft Plan.

## 2.7 Fire management

The Draft Plan deals with this issue in Section 4.1 (Fire Management), however there are also relevant prescriptions in Section 5.2 (Camping).

### **Representations**

Two representations suggest that the prescriptions for fire management, particularly campfires, could be more proactive. It is suggested that open fires should be banned, thus requiring visitors to bring fuel stoves. Another suggestion is that open fires should not be permitted during certain seasons.

The TRVA indicate that the Association would like to work with reserve users and managers to establish bushfire prevention measures.

The Waterhouse Coast Care Group object to the Draft Plan stating in Section 4.1 (Fire Management) that ***“Most damage is associated with breaks established to protect shacks at Little Waterhouse Lake, Croppies Point, Waterhouse Point and Ransons Beach.”*** The Group states that shack owners should not be blamed for ***“...lack of direction from fire management authorities to dozer divers.”***

### **Director’s response**

The Director notes that campfires are very popular among visitors to the reserve, and given that campfire escape is a minor cause of wildfire ignitions, it is not proposed to prohibit campfires. Under the Draft Plan fire places will only be permitted at identified campsites. The Draft Plan states that ***“Fires will be prohibited in the reserve during periods of high to extreme fire danger, as well as during days of Total Fire Ban.”*** This prescription addresses the control of fire during fire danger seasons.

In response to the Waterhouse Coast Care Group’s concerns the Director proposes that the Draft Plan be amended by removing references to specific shack site locations.

### **Commission commentary and recommendations**

The Draft Plan prescribes for visitors to be encouraged to bring their own fuel stoves to the reserve. Fire places at specific campsites will also be available for use by reserve visitors. The Commission considers that these prescriptions are reasonable, particularly when combined with the prescription prohibiting fire during high to extreme fire danger and Total Fire Ban days.

The Commission does not consider that the Draft Plan states or implies that shack owners are to blame for damage that may have occurred in establishing fire breaks. If damage occurred at the shack site locations referred to in the Draft Plan, then there does not appear to be a reason to delete the references to those shack locations. However, if damage did not occur at those locations the Draft Plan is factually incorrect and should be amended.

## 2.8 Shacks

Section 5.3 of the Draft Plan is dedicated to shacks.

## **Representations**

The Freshwater Anglers' Council of Tasmania comment that shacks on the edge of Blackmans Lagoon outside the boundary of the reserve cannot be subject to a management plan. However, consideration should be given to a communal waste disposal system to minimise impacts on water quality within the reserve.

The World Wide Fund for Nature Australia comment that the placement of shacks at Little Waterhouse Lake is not best practice management for a Ramsar listed wetland. The Fund recommend that shacks be removed from Little Waterhouse Lake, but acknowledge that this may not be achievable in the short term. It is recommended that these shacks are maintained to high standards to ensure that the Lake, or surrounding land, is not contaminated or damaged.

There was objection to the Draft Plan including the names of some shack owners and not others, with the belief that those shacks that were not named would be removed.

## **Director's response**

The Draft Plan acknowledges that the shacks on the edge of Blackmans Lagoon outside the reserve are not covered by the management plan. No change to the Plan is proposed.

A separate legislative process is in place for determining the future of all shacks on Crown land therefore no change to the Draft Plan is proposed.

The Director indicates that ***"The naming of beach access points was proposed and endorsed at a public meeting to minimise confusion over the location of the agreed authorised beech access points for the purpose of boat launching. It does not signal approval of any shacks."***

## **Commission commentary and recommendations**

The Draft Plan, in Section 5.3 under the heading 'A Policy Process', explains that shacks in the Waterhouse Conservation Area are subject to the ***Crown Land (Shack Sites) Act 1997***. This Act provides a process for determining the future of shacks on Crown land. It would be inappropriate for the Draft Plan to attempt to pre-empt the process being carried out under the ***Crown Land (Shack Sites) Act 1997***. No change to the Draft Plan is recommended.

## **2.9 Horse access**

Horse access is dealt with in Section 5.9 of the Draft Plan.

## **Representations**

One representation gives an example of the permit system not working and states that a permit should be easy to arrange and obtain; and the timing should be flexible due to changes in weather conditions or the rider's circumstances. This representor suggests that the issuer of the permit should be easy to contact and permits should be available through the post, and the time of riding should be any day within a week.

Another representation states that the prescription requiring horse access to be restricted to damp firm sand below high tide line needs to be enforced and signed.

### **Director's response**

The Director advises that written authorities to horse ride in the reserve are available from Bridport, St Helens and Launceston and can usually be issued through the post. The written authority currently provides for 7 days of flexibility around the nominated trip date. No change to the Draft Plan is proposed.

The Director comments that enforcement of horse access prescriptions is an operational matter, beyond the scope of the Draft Plan.

### **Commission commentary and recommendations**

The Draft Plan and the Director's response appear to adequately address the concerns of the representor regarding ease of arranging and obtaining a permit to ride a horse in the reserve.

The Commission agrees with the Director that no change to the Draft Plan is required regarding horse access.

## **2.10 Boating access**

This issue is dealt with in Section 5.8 (Boating Access).

### **Representations**

Representations raised the second dot point prescription, which restricts the use of boats on Little Waterhouse Lake to unpowered vessels or vessels powered by electric motors with a maximum speed of 5 knots. Representations from fishing groups do not support the restriction on boats on Little Waterhouse Lake, claiming that pollution from petrol powered boats is negligible and has not been proven. The World Wide Fund for Nature Australia support the prescription entirely, and also welcome speed restrictions on the other wetland sites.

The Waterhouse Coast Care Group put a case for changing prescription dot point 7 to read "**Investigate the possibility of further improving boat launching facilities at all major camping zones.**" The Group is opposed to one launching site.

### **Director's response**

The Director advises that "**The proposal to provide users the choice of unpowered or electric powered boats was raised at a public meeting and received wide support, therefore no change is recommended.**"

In response to the representation from the Waterhouse Coast Care Group, which sought improved boat launching facilities at all major camping zones, the Director advises that this facility cannot be provided unless PWS obtains additional funding. It is suggested that funds could be secured

through a user pays system. It is also noted that Marine and Safety Tasmania do not support a boat launching facility at Blizzards Landing.

### ***Commission commentary and recommendations***

In recognition of the Ramsar status of Little Waterhouse Lake, the Commission supports the restriction of boating to unpowered or electric powered boats.

The provision of boat launching facilities at all major camping zones appears to be sought for the convenience of boat users. Consolidation of boat launching facilities is more resource efficient. The Director suggests that funds could be raised through the implementation of a user pays system, which could then be allocated to improving boat launching facilities. This is a matter that requires ongoing consultation between the users of the reserve and PWS. No change to the Draft Plan is recommended at this stage.

## **2.11 Resourcing**

Section 6.3 (Plan Implementation) of the Draft Plan deals with resourcing.

### ***Representations***

Several representors are concerned that whilst the prescriptions contained in the Draft Plan are sound, in the absence of adequate resourcing the objectives of the plan will not be achieved. It was suggested that the Draft Plan include an implementation plan that prioritises tasks, sets a time schedule, and allocates resources. The Tasmanian Conservation Trust submit that the plan cannot be supported until such time as a 'proper resourcing strategy' is prepared. This issue was also raised by Environment Australia with particular reference to management of Little Waterhouse Lake Ramsar wetland.

### ***Director's response***

The Director advises that a Senior Ranger was appointed in June 2001 and another ranger will be located at the Bridport Field Centre to provide greater management presence in the reserve.

In response to the comments from the Tasmanian Conservation Trust the Director acknowledges the need for stronger links between management plans and day to day operational activities, and is occurring through District operational planning. Allocation of resources is considered to be beyond the scope of a statutory management plan. However, the Director proposes an Appendix be included in the Draft Plan identifying key actions and priorities for future management in the reserve.

### ***Commission commentary and recommendations***

The Commission agrees that resources are required to implement the prescriptions in the Draft Plan. Whilst this is a matter beyond the scope of a management plan, it is clear that successful implementation of the plan will depend on adequate resourcing. This is particularly the case where monitoring and environmental assessment is required to ensure that activities are not adversely impacting on the values of the reserve. The Commission recommends that priority be given to resourcing monitoring and assessment programs in the Waterhouse Conservation Area.

The proposal to include a schedule as an Appendix to the plan, identifying and prioritising actions for managing the reserve is fully supported.

## **2.12 Management zones**

Section 2.3 (Management Zones) of the Draft Plan provides for four zones within the reserve: Visitor Services Zone, Recreation Zone, Natural Zone and Special Use Natural Zone.

### **Representations**

The issues raised regarding management zones primarily relate to whether or not signage is appropriate in the Natural Zone. The IFS submit that signage would assist educate and inform anglers, particularly regarding restrictions on bait-fishing and boating restrictions. Birds Australia also consider that interpretative signs in the Natural Zone should be provided.

Representations queried how the prescription for the Natural Zone – Encourage existing developments in these Zones to be removed – can be achieved in the absence of “...**firm closure dates for unwanted developments.**”

### **Director’s response**

The Director proposes that the Draft Plan be modified to enable some limited interpretative signage at Little Waterhouse Lake in recognition of its Ramsar wetland status. The rationale is to keep Natural Zones as free of infrastructure as possible.

The prescription that seeks to encourage existing developments in the Natural Zone to be removed refers to three shacks. The future of these shacks will be considered separately under the **Crown Land (Shack Sites) Act 1997**. No change to the Draft Plan is proposed.

### **Commission commentary and recommendation**

The Commission supports the inclusion of interpretative signage at Little Waterhouse Lake, but agrees with the Director that, in general, signage in the Natural Zone should be kept to an absolute minimum.

As discussed in section 2.8 above, the future of shacks on Crown land is subject to a process under the **Crown Land (Shack Sites) Act 1997**, and is beyond the scope of a management plan. No change to the Draft Plan is recommended.

### **3.0 Consolidated principal recommendations**

This chapter of the report draws together the Commission's principal recommendations from chapter 2. These recommendations do not include factual corrections, and, or, minor editorial changes to the Draft Plan that have been agreed by the Director.

#### **Recommendation 1**

Amend the Draft Plan to re-word the second prescription dot point under Section 5.6 (Fishing) which refers to what fish species can be used to re-stock the lakes of the reserve.

- Brown and rainbow trout, salmon and salmon hybrids may be used to stock the lakes within the reserve and is to be carried out under the strict supervision of the Inland Fisheries Service.

#### **Recommendation 2**

Add a new prescription under Section 3.5 (Wetlands) and Section 5.6 (Fishing) to provide for continuing liaison with Inland Fisheries with respect to assessment and monitoring of potential impacts:

- Liaise with and support the Inland Fisheries Service with regard to assessment and monitoring of potential environmental impacts of the trout and salmon fishery in the reserve.

#### **Recommendation 3**

The Commission recommends that preparation of the regional fishery management plan be given priority by the Inland Fishery Service.

#### **Recommendation 4**

Delete the existing dot point prescription four under Section 5.6 (Fishing) and insert three new prescriptions:

- A general authority is granted to bait fish at Blackmans Lagoon, Little Waterhouse and Big Waterhouse Lakes, using specified bait.
- Bait fishing and bait collection is limited to the use of:
  - mudeyes' (dragonfly larvae), brought in or collected on site, and
  - wattle grubs, brought in from outside the reserve.
- PWS will liaise with and assist IFS in managing the impacts of bait fishing in the reserve, including the provision of information to anglers about acceptable bait and other requirements of the management plan and the monitoring of angler pressure on the lakes, particularly Little Waterhouse Lake.

### **Recommendation 5**

Re-word the text under Section 4.6 (Leases, Licences, Written Authorities) referring to platypus bycatch to read:

*“In the past eel fishing has resulted in a significant by-catch of platypus, usually resulting in death of these. In the past, eel fishing at other locations around the State has resulted in a by-catch of platypus, usually resulting in the death of these animals. Platypus have not been recorded in the reserve, but they have been recorded in streams close by.”*

### **Recommendation 6**

Amend dot point prescriptions one and three in Section 4.6 (Leases, Licences, Written Authorities):

- The continued conduct of any commercial eel fishery within the Waterhouse Conservation Area will be subject to a regional fishery management plan when it is developed, until then the conditions of the current licence will continue to apply.
- To prevent the inadvertent drowning of platypus or other species, only eel nets fitted with a screen or set with a raised cod-end may be used in the reserve.

### **Recommendation 7**

The Commission recommends that if eel re-stocking is to be contemplated by the IFS then a scientifically acceptable monitoring and assessment program should be developed and implemented to determine any environmental impacts of eel re-stocking, and an eel fishery generally, before a decision is made to authorise eel re-stocking under the eel fishery management plan.

### **Recommendation 8**

Amend the Draft Plan by including as an Appendix the Ramsar Information Sheet for Little Waterhouse Lake and a detailed map showing the boundaries of the Ramsar site.

### **Recommendation 9**

Amend policy dot point two in Section 3.5 (Wetlands) to read:

- Ensure that relevant water users are adhering to the requirements of the *Water Management Act 1999* in their use of water from Blackmans Lagoon.
- Any applications for licences to extract water for commercial purposes from lakes in the reserve would be assessed taking into account the environmental values and significance of the reserve and would not normally be approved.

### **Recommendation 10**

Amend Section 3.5 (Wetlands) to include a new Aim:

- Work with landowners and other State agencies to minimise impacts on the wetlands where possible.

### **Recommendation 11**

Amend Section 3.5 (Wetlands) to include two new Policies:

- Any action which has, will have, or is likely to have a significant impact on the ecological character of the Little Waterhouse Lake Ramsar Wetland, will be referred to the Commonwealth Minister for Environment and Heritage to determine whether the action is subject to the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).
- Continue to liaise with the Inland Fisheries Service with respect to the release of recreational fish species into the wetlands of the reserve.

### **Recommendation 12**

Amend Section 3.5 (Wetlands) by listing all prescriptions that specifically relate to the management of the Ramsar wetland:

#### **Ramsar Wetland Management**

Little Waterhouse Lake and its surrounding area has been included in a Natural Zone (see Section 2.3 and Map 3). Prescriptions throughout the plan relating to the management of Little Waterhouse Lake are listed below.

#### **Prescriptions**

- Encourage the removal of existing development in the Natural Zone (see Section 2.3).
- Except for natural or cultural protection works, exclude other types of development, including visitor or private buildings or other structures and facilities (see Section 2.3).
- Survey and monitor water bodies in the conservation area and catchment to establish baseline information; identify environmental water requirements and identify changes that might threaten the ecological character of wetlands in the reserve (see Section 3.2).
- Liaise with other relevant agencies and neighbouring landowners to develop and implement strategies (such as buffer zones along watercourses) to reduce runoff of sediment, pesticides and fertilisers (see Section 3.2).
- Liaise with other relevant agencies and neighbouring landholders to ensure integrated management of the catchments of the reserve (see Section 3.2).
- Priority will be given to weed management strategies around Little Waterhouse Lake (see Section 4.4).

- The continued conduct of any commercial eel fishery within the Waterhouse Conservation Area will be subject to a regional fishery management plan when it is developed, until then the conditions of the current licence will continue to apply (see Section 4.6).
- No eel restocking will occur within the reserve unless authorised under an approved fishery management plan (see Section 4.6).
- To prevent the inadvertent drowning of platypus or other species, only eel nets fitted with a screen or set with a raised cod-end may be used in the reserve (see Section 4.6).
- Stakes used for eel netting will be removed at the completion of each season (see Section 4.6).
- Monitor Little Waterhouse Lake for human impacts and, where necessary, implement preventative or remedial actions (see Section 5.1).
- All fish stocking within the reserve is to be carried out under the strict supervision of the Inland Fisheries Service (see Section 5.6).
- Bait fishing in Little Waterhouse Lake will continue to be subject to a general authority (see Section 5.6).
- Bait fishing and bait collection is limited to the use of
  - mudeyes' (dragonfly larvae), brought in or collected on site, and
  - Wattle grubs, brought in from outside the reserve.
- PWS will liaise with and assist IFS in managing the impacts of bait fishing in the reserve, including the provision of information to anglers about acceptable bait and other requirements of the management plan and the monitoring of angler pressure on the lakes, particularly Little Waterhouse Lake.
- Proposals for manipulative changes to fish habitat including drainage changes and the damming of flood affected lakes will be assessed according to the procedures established in Section 4.9 (see Section 5.6).
- Liaise with the Inland Fisheries Service on the dissemination of information to fishers (see Section 5.6).
- Prepare and disseminate information for local fishers publicising the changes to fishing regulations within the conservation area (see Section 5.6).
- Educate fishers about the environmental impacts of bait fishing and benefits of using lures (see Section 5.6).
- Encourage a more strategic and informed basis for restocking the lakes of the reserve (see Section 5.6).

- In recognition of its Ramsar status, as well as the need for a well distributed sanctuary system within Tasmania to provide for sustainable duck hunting, the taking of duck on Little Waterhouse Lake is prohibited (see Section 5.7).
- All duck hunting hides on Little Waterhouse Lake will be removed (see Section 5.7).
- The use of boats on Little Waterhouse Lake is restricted to un-powered vessels or vessels powered by electric motors with a maximum speed of 5 knots (see Section 5.8).

**Recommendation 13**

Include a prescription in Section 3.5 (Wetlands) under the Ramsar wetland management section as follows:

- Assess the stability of dunes and the earthen wall that dams Little Waterhouse Lake, and undertake restoration or rehabilitation activities, if required.

**Recommendation 14**

Delete dot point three Policy in Section 3.5 (Wetlands) of the Draft Plan:

*“Assess, and if appropriate, prepare a recommendation to alter the Ramsar listing of Little Waterhouse Lake, revising the criteria used to list the wetland.”*

**Recommendation 15**

Include a new Aim in Section 3.5 (Wetlands):

*“- to update the Ramsar Information Sheet for the Little Waterhouse Lake Ramsar Wetland to include a more comprehensive description of the Lake and the ecological values for which it was listed.”*

Expand the Aims for managing wetlands to reflect the general principles of wetland management prescribed in the *EPBC Regulations 2000*.

**Recommendation 16**

Include a new prescription in Section 3.5 (Wetlands):

- Liaise with and support the Inland Fisheries Service with regard to assessment and monitoring of potential environmental impacts of the trout and salmon fishery in the reserve.

**Recommendation 17**

It is recommended that the Draft Plan be reviewed 7 years after approval by the Governor, in recognition of the Ramsar wetland status of Little Waterhouse Lake.

**Recommendation 18**

The Commission recommends that Section 3.5 (Wetlands) include a statement that the plan has been developed in accordance with Australia’s Ramsar Management Principles.

**Recommendation 19**

Include a new prescription in Section 5.4 (Vehicle Use and Access) to read as follows:

- The Parks and Wildlife Service will have the discretion to issue individual authorities for special, limited and conditional use of recreational vehicles on non-designated routes.

**Recommendation 20**

Include a new prescription in Section 5.4 (Vehicle Use and Access) providing that a program be prepared for the relocation of vehicle routes over Aboriginal sites and alternative routes be identified in consultation with the Aboriginal community and other users.

**Recommendation 21**

Delete prescription dot point 6 in Section 4.1 (Fire Management), which requires preparation of Aboriginal heritage sensitivity zones to aid in fire response.

**Recommendation 22**

Amend the Draft Plan to acknowledge that Aboriginal values are being damaged:

*“...to indicate that values are being damaged and that, in cooperation with users, efforts will be made to avoid or mitigate impacts.”*

**Recommendation 23**

Include a prescription in Section 5.2 (Camping) to ensure that the Aboriginal community is consulted where campsites impact on Aboriginal values. The prescription should provide that where Aboriginal sites are located at or near campsites, consultation with the Aboriginal community shall occur regarding the management of those campsites, preparation of site plans, and the installation of toilets and associated camping facilities.

**Recommendation 24**

Include a prescription in Section 5.2 (Camping) providing that free range camping shall not be permitted on Aboriginal sites.

**Recommendation 25**

The Commission recommends that priority be given to resourcing monitoring and assessment programs in the Waterhouse Conservation Area.

**Recommendation 26**

Amend the Draft Plan to include an Appendix identifying key actions and priorities for future management in the reserve.

**Recommendation 27**

Amend Section 2.3 (Management Zones) of the Draft Plan to enable some limited interpretative signage at Little Waterhouse Lake in recognition of its Ramsar wetland status.

**Appendix 1**

**REPRESENTATIONS RECEIVED ON THE DRAFT PLAN 2000**

1	Birds Australia	Legana, Tasmania
2	Mr Todd Dudley	St Marys, Tasmania
3	Fly Fishers' Club of Tasmania Inc	Devon, Tasmania
4	Mr Dale Orchard	Nabowla, Tasmania
5	Mr Eric Dolley	Scottsdale, Tasmania
6	Mr Stuart Campbell	Bridport, Tasmania
7	Inland Fisheries Service	Moonah, Tasmania
8	Freshwater Angler's Council of Tas	Summerhill, Tasmania
9	Waterhouse Coast Care Group Inc	Tasmania
10	World Wide Fund for Nature Aust	Tasmania
11	Tas Recreational Vehicle Assoc Inc	Glenorchy, Tasmania
12	Mr Wally Alexander	Ringarooma, Tasmania
13	Tasmanian Conservation Trust	Hobart, Tasmania
14	Tas Aboriginal Land Council	North Hobart, Tasmania
15	Environment Australia	Canberra, ACT
16*	Inland Fisheries Service	Moonah, Tasmania
17	Crown Law	Hobart, Tasmania
18	National Parks & Wildlife Advisory Council	Hobart, Tasmania

\* Supplementary submission received after the close of the public exhibition period.

**Appendix 2**

**Director's report dated 3 December 2001**

**SUBJECT: REPORT ON REPRESENTATIONS RECEIVED ON THE WATERHOUSE  
CONSERVATION AREA DRAFT MANAGEMENT PLAN 2000**

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### **Summary of Representations on the draft plan**

A draft of the Waterhouse Conservation Area Management Plan 2000 was made available for comment by the general public and the National Parks and Wildlife Advisory Council between the 17 June and 14 August 2000. Eighteen representations were received from individuals, groups and various organisations. Each representation to the draft plan has been carefully considered and further consultation has occurred with particular groups in order to clarify points and seek agreement on changes to the draft management plan.

The major issues raised during the public comment process, a consideration of the issue and the proposed change (in bold) to the draft plan are summarised below. The more minor issues raised are responded to in the attached schedule in accordance with the criteria listed in the public comment guide in the front of the draft plan.

### **MANAGEMENT OF FISHERIES**

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#### **MAJOR ISSUE: FISHING AND STOCKING WITH EXOTIC FISH SPECIES**

##### **Prescription in Draft Plan**

- The only recreational fish species that may be used to stock the reserve are brown and rainbow trout.

##### Background

Fishing occurs in the three major fresh water bodies within Waterhouse Conservation Area. These lagoons have been stocked with exotic fish species, most particularly trout, by the Inland Fisheries Service for a number of years and now support a valuable recreational fishery. Breeding is negligible in these lakes, so the continuation of the recreational fishery is reliant upon a continuous stocking program.

The draft plan originally proposed to continue trout fishing in the reserve, subject to Inland Fisheries Service regulations but to limit the stocking program of exotic fish species to brown and rainbow trout. The Inland Fisheries Service disagreed with the second part of this proposal as it wishes to keep its options open with regard to re-stocking with other recreational species including salmon and salmon hybrids.

One respondent stated that trout should not be re-stocked in any of the lakes of the reserve as they may impact on threatened species such as the green and gold frog. The representations from the World Wildlife Fund for Nature and Environment Australia (Wetlands Program) were concerned that no mechanisms were proposed in the draft plan to monitor or assess the potential impacts of the trout fishery on Little Waterhouse Lake.

The National Parks and Wildlife Advisory Council believed that the phraseology of the plan indicates that PWS is reluctant to face this issue with regard to trout fishing in the reserve. They also wished to know to what extent has the PWS engaged in discussion with Inland Fisheries about strategic policy, as distinct from individual case instances.

The issue of trout fishing on reserved lands needs to be addressed at a broad agency level between PWS and Inland Fisheries. The IFS has made it quite clear over the last few years that it supports

continued recreational fishing (including bait fishing) and stocking of waterbodies in conservation areas and other reserved land. With respect to Waterhouse, the *Inland Fisheries Act 1995* enables IFS to introduce recreational fish species into the freshwater wetlands of the reserve unless this statutory power is restricted, with the agreement of IFS, by a management plan. The IFS has made it clear on numerous occasions that it will not accept such a restriction. PWS is not in a strong position to argue for restrictions on conservation grounds unless there is clear evidence to suggest that trout and other introduced species may have an impact on species such as the green and gold frog or other biota. The healthy population of green and gold frog in Blackmans Lagoon would suggest that the two species can co-exist. However, it is recommended that the environmental impact of the trout fishery be assessed and monitored. The most appropriate mechanism for doing this may be through the Regional Fishery Management Plan proposed by the Inland Fisheries Service where PWS will be a chief stakeholder as land manager for the reserve.

### **Proposed Changes**

**It is proposed to amend the plan to re-word the second prescription dot point under Section 5.6 (Fishing) which refers to what fish species can be used to re-stock the lakes of the reserve.**

- **Brown and rainbow trout, salmon and salmon hybrids may be used to stock the lakes within the reserve and is to be carried out under the strict supervision of the Inland Fisheries Service.**

**It is proposed to add a new prescription under Section 3.5 (Wetlands) and Section 5.6 (Fishing) to provide for continuing liaison with Inland Fisheries with respect to assessment and monitoring of potential impacts:**

- **Liaise with and support the Inland Fisheries Service with regard to assessment and monitoring of potential environmental impacts of the trout and salmon fishery in the reserve.**

### **MAJOR ISSUE: BAIT FISHING**

#### **Prescription in Draft Plan**

- Bait fishing and bait collection within the reserve is limited to written authority holders only, and further limited to the use of
  - ‘mudeyes’ (dragonfly larvae), brought in or collected on site, and
  - Wattle grubs, brought in from outside the reserve.

#### Background

Prior to late 1996, when the Waterhouse Protected Area was reserved under the *Crown Lands Act 1976*, fishers were free to bring bait into the reserve and to collect bait within the reserve for fishing. With the change of reservation status to a conservation area the *National Parks and Reserved Land Regulations 1999* now apply. These regulations effectively prohibit fishers from collecting on site (which involves some degree of habitat disturbance) or bringing animals into the reserve which are not native to that reserved land. The reason for this is that the transport of any animals into the reserve increases the risk of accidental release of harmful species or disease.

The community consultation process for the plan included a public meeting in November of 1998 to specifically discuss the management of the recreational fishery. Major stakeholders invited to the meeting included the Branxholm Fishing club, the Bridport Fishing Club, the Scottsdale Fishing Club, the Freshwater Anglers Council of Tasmania, the North East Fisheries Association and the Fly Fishers Club of Tasmania. In recognition of the need for fishers to be consistent with the reserve regulations, the meeting discussed and found general agreement on a written authority system for the use of bait, but limited to two types, ‘mudeyes’ and wattle grubs. It was also agreed that such a system would be implemented as soon as possible. In 1999 the written authority system was implemented, and

continues to be in place. While the level of compliance is unknown this year alone of a total of 56 authorities issued for Waterhouse CA have been endorsed for bait fishing.

A blanket authority could be issued for the reserve by a variety of means, rather than stay with the separate written authorities. The most important argument for retaining the individual written authority system is the Ramsar designation of Little Waterhouse Lake. It is considered that without close regulation of bait fishing there is a real risk of an invasive species being introduced to this site. It is further considered that the PWS has a legislative responsibility under the Commonwealth *Environment Protection & Biodiversity Conservation Act 1999*. Under this Act a person must not take an action that has, will have, or is likely to have, a significant impact on the ecological character of a Ramsar wetland, without approval from the Commonwealth Environment Minister. Such an action specifically includes the introduction, or likely introduction of an invasive species that is harmful to the ecological character of the wetland.

Since 1999 the Freshwater Anglers Council of Tasmania has lobbied for a blanket authorisation to bait fish in conservation areas across the State, including Waterhouse. This is reflected in the representations. Two fishing groups felt that the requirement for individual authorities for bait fishing was an unnecessary burden and that a general authority should be issued. The Inland Fisheries Service oppose the proposed restrictions for bait fishing and would like to see a general authority for all three locations in the reserve.

### **Proposed Changes**

**It is proposed to delete the prescription referred to and insert three new prescriptions under Section 5.6 (Fishing) which now reads:**

- **A general authority is granted to bait fish at Blackmans Lagoon, Little Waterhouse and Big Waterhouse Lakes, using specified bait.**
- **Bait fishing and bait collection is limited to the use of**
  - **mudeyes' (dragonfly larvae), brought in or collected on site, and**
  - **Wattle grubs, brought in from outside the reserve.**
- **PWS will liaise with and assist IFS in managing the impacts of bait fishing in the reserve, including the provision of information to anglers about acceptable bait and other requirements of the management plan and the monitoring of angler pressure on the lakes, particularly Little Waterhouse Lake.**

### **MAJOR ISSUE: EEL NETTING**

#### **Prescriptions in Draft Plan**

- The continued conduct of any commercial eel fishery within the Waterhouse Conservation Area is subject to an eel fishery management plan being prepared by the licensee and agreed to by the Director.
- Only screened eel nets may be used in the reserve to prevent the by-catch of platypus.

#### Background

One licenced eel fishing operation nets eels from Blackmans Lagoon and Big and Little Waterhouse Lakes. The fishery has been largely based on a natural population supplemented by stocking by Inland Fisheries and the eel fisher.

The impact of a commercial eel fishery on the lakes of the reserve, particularly associated with a restocking program, is poorly researched and understood. Lack of knowledge has particular significance for Little Waterhouse Lake, given that it is a wetland of international significance (see Section 3.5). It is possible that impact on natural values is occurring.

The Inland Fisheries Service questioned a reference in the plan on platypus bycatch as not being proven. Certain changes to the text in the plan are proposed below as are further measures on the type of nets which can be used for eel netting.

The World Wildlife Fund for Nature recommended that eel re-stocking of Little Waterhouse Lake be discontinued and that the impact of eel re-stocking on Blackmans Lagoon was required through research. Environment Australia (Wetlands Program) felt that the prescriptions under the eel fishing section should address the lack of understanding of this practice and include provisions for further research into the impacts of eeling to inform future management decisions.

The continued operation of an eel fishery is consistent with small-scale resource use which is one of the management objectives for conservation areas. However, the impact of supplementing the eel population to sustain the fishery should be investigated. The Inland Fisheries Service has indicated to PWS that this issue will be considered as part of the proposed Regional Fishery Management Plan to be prepared by the Inland Fisheries Service. PWS is a major stakeholder as land manager for the reserve and is to be consulted during the planning process. The first suggested prescription listed below provides for this.

### **Proposed Changes**

**It is proposed to re-word the text under Section 4.6 (Leases, Licences and Authorities) referring to platypus bycatch from:**

**In the past eel fishing has resulted in a significant by-catch of platypus, usually resulting in death of these animals**

**to:**

**In the past, eel fishing at other locations around the State has resulted in a by-catch of platypus, usually resulting in the death of these animals. Platypus have not been recorded in the reserve, but they have been recorded in streams close by.**

### **Amended Prescriptions from Section 4.6**

- **The continued conduct of any commercial eel fishery within the Waterhouse Conservation Area will be subject to a regional fishery management plan when it is developed, until then the conditions of the current licence will continue to apply.**
- **To prevent the inadvertent drowning of platypus or other species, only eel nets fitted with a screen or set with a raised cod-end may be used in the reserve.**

## **RAMSAR WETLAND MANAGEMENT**

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### **MAJOR ISSUE: MANAGEMENT OF LITTLE WATERHOUSE LAKE**

#### **Aim in Draft Plan**

- to develop a more appropriate Ramsar listing for the wetlands of the reserve.

#### **Prescription in Draft Plan**

- Assess, and if appropriate, prepare a recommendation to alter the Ramsar listing of Little Waterhouse Lake, revising the criteria used to list the wetland.

#### **Background**

Little Waterhouse Lake is one of the three main wetland systems in the conservation area and was listed under the Ramsar Convention Wetland as an internationally significant wetland in November 1982.

One of the two criteria used to list Little Waterhouse Lake as a Wetland of International Importance under the Ramsar Convention is that;

*'it is a particularly good representative example of a natural or near-natural wetland, common to more than one biogeographical region'.*

During the preparation of the draft plan it was felt that, because the wetland had been modified through human actions, it did not qualify on the basis of this criteria. The wetland is largely surrounded by cleared land, the water flowing into the wetland drains from agricultural land, several shacks are located on the shore of the lake and the lake itself has been modified. Modification involved the construction of an earthen wall which effectively dams the lake. Further downstream a ford has been built for fire management purposes.

The World Wide Fund for Nature and Environment Australia (Wetlands Program) have expressed concern over the proposal in the plan to alter the listing for the Little Waterhouse Lake. The Waterhouse Coastcare Group felt that there is neither the need nor the justification to alter the Ramsar listing for the lake.

Environment Australia, in its representation, also considered that the policies and management prescriptions associated with the management of the Ramsar wetland were not site specific or easily identifiable as they were often contained in different sections of the plan. It was also suggested that as the Commonwealth *Environment Protection and Biodiversity Act 1999* had implications for the management of Ramsar sites in Australia that the legislation and approval requirements should be referred to in the plan.

### **Proposed Changes**

**As the modifications to the wetland were made over a number of years prior to its listing under the Ramsar Convention, it is now proposed that the original criteria be retained. It is proposed to remove the aim and associated prescription which refers to the listing being altered.**

**Additionally, it is proposed to add two extra policies which are intended to provide a better framework for management of the Ramsar wetland and provide a mechanism for continued liaison with the Inland Fisheries Service over the stocking of trout and other recreational species in Little Waterhouse Lake.**

#### **New Aim**

- **Work with landowners and other state agencies to minimise impacts on the wetlands where possible.**

#### **New Policies**

- **Any action which has, will have, or is likely to have a significant impact on the ecological character of the Little Waterhouse Lake Ramsar Wetland, will be referred to the Commonwealth Minister for Environment and Heritage to determine whether the action is subject to the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).**
- **Continue to liaise with the Inland Fisheries Service with respect to the release of recreational fish species into the wetlands of the reserve.**

**It is proposed that a new section be added to the plan as part of Section 3.5 which lists the prescriptions which specifically relate to the management of the Ramsar wetland in accordance with the suggestion of Environment Australia. The suggested text follows below:**

## **Ramsar Wetland Management**

Little Waterhouse Lake and its surrounding area has been included in a Natural Zone (see Section 2.3 and Map 3). Prescriptions throughout the plan relating to the management of Little Waterhouse Lake are listed below.

### **Prescriptions**

- Encourage the removal of existing development in the Natural Zone (see Section 2.3).
- Except for natural or cultural protection works, exclude other types of development, including visitor or private buildings or other structures and facilities (see Section 2.3).
- Survey and monitor water bodies in the conservation area and catchment to establish baseline information; identify environmental water requirements and identify changes that might threaten the ecological character of wetlands in the reserve (see Section 3.2).
- Liaise with other relevant agencies and neighbouring landowners to develop and implement strategies (such as buffer zones along watercourses) to reduce runoff of sediment, pesticides and fertilisers (see Section 3.2).
- Priority will be given to weed management strategies around Little Waterhouse Lake (see Section 4.4).
- The continued conduct of any commercial eel fishery within the Waterhouse Conservation Area will be subject to a regional fishery management plan when it is developed, until then the conditions of the current licence will continue to apply (see Section 4.6).
- No eel restocking will occur within the reserve unless authorised under an approved fishery management plan (see Section 4.6).
- To prevent the inadvertent drowning of platypus or other species, only eel nets fitted with a screen or set with a raised cod-end may be used in the reserve (see Section 4.6).
- Stakes used for eel netting will be removed at the completion of each season (see Section 4.6).
- Monitor Little Waterhouse Lake for human impacts and, where necessary, implement preventative or remedial actions (see Section 5.1).
- All fish stocking within the reserve is to be carried out under the strict supervision of the Inland Fisheries Service (see Section 5.6).
- Bait fishing in Little Waterhouse Lake will continue to be subject to a general authority (see Section 5.6).
- Bait fishing and bait collection is limited to the use of
  - mudeyes' (dragonfly larvae), brought in or collected on site, and
  - Wattle grubs, brought in from outside the reserve.
- PWS will liaise with and assist IFS in managing the impacts of bait fishing in the reserve, including the provision of information to anglers about acceptable bait and other requirements of the management plan and the monitoring of angler pressure on the lakes, particularly Little Waterhouse Lake.

- **Proposals for manipulative changes to fish habitat including drainage changes and the damming of flood affected lakes will be assessed according to the procedures established in Section 4.9 (see Section 5.6).**
- **Liaise with the Inland Fisheries Service on the dissemination of information to fishers (see Section 5.6).**
- **Prepare and disseminate information for local fishers publicising the changes to fishing regulations within the conservation area (see Section 5.6).**
- **Educate fishers about the environmental impacts of bait fishing and benefits of using lures (see Section 5.6).**
- **Encourage a more strategic and informed basis for restocking the lakes of the reserve (see Section 5.6).**
- **In recognition of its Ramsar status, as well as the need for a well distributed sanctuary system within Tasmania to provide for sustainable duck hunting, the taking of duck on Little Waterhouse Lake is prohibited (see Section 5.7).**
- **All duck hunting hides on Little Waterhouse Lake will be removed (see Section 5.7).**
- **The use of boats on Little Waterhouse Lake is restricted to un-powered vessels or vessels powered by electric motors with a maximum speed of 5 knots (see Section 5.8).**

## **WATER MANAGEMENT**

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### **MAJOR ISSUE: POTENTIAL WATER EXTRACTION FROM WETLANDS WITHIN THE RESERVE**

#### **Prescription in Draft Plan**

- Monitor the pumping of water from the lakes of the reserve to ensure common law water rights are not exceeded.

#### Background

Water is currently being pumped from Blackmans Lagoon for domestic and agricultural purposes such as watering livestock, but not for pasture irrigation. The volume and purpose for which water can be extracted for riparian water entitlements are provided under the *Water Management Act 1999*.

Birds Australia have questioned why the pumping of water from Blackmans Lagoon is allowed to occur. The World Wide Fund for Nature (WWF) and the National Parks and Wildlife Advisory Council queried whether the present rates of extraction are monitored and, if so, who by and what mechanisms are in place to modify the level of extraction during dry periods. The WWF also recommends that a clause be added to the plan to ensure that water extraction is not permitted from either Big or Little Waterhouse Lakes.

A limited amount of pumping from Blackmans Lagoon is conducted on the basis of a pumphouse licence issued under the *Crown Lands Act 1976*. The volume of water currently extracted from Blackmans Lagoon is not believed to be excessive. The Water Division of DPIWE has indicated that in this situation licenced water users are not required to report on the amount of water extracted for the purpose of domestic supply (household & garden use and stock watering). The Water Division has also indicated that the Department would not issue any water licences (for commercial purposes) for either of the Waterhouse Lakes. A right to extract water for a specified purpose may apply to landholders who have a riparian tenement within the meaning of the *Water Management Act 1999*. However, this Act states that a person who is an occupier of a tenement, to which a riparian tenement might usually apply, does not necessarily confer any rights over a riparian Crown reserve ie. Waterhouse Conservation Area, however the Secretary of the Department administering *Crown Land*

*Act 1976* ie. DPIWE may grant an easement or licence over the Crown reserve for the taking of water. This power is of relevance to Big Waterhouse Lake where the reserve boundary lies quite close to the lake edge (within approximately 30 m depending on lake levels). Little Waterhouse Lake is sufficiently distant from the reserve boundary so no riparian tenements apply.

The power to grant an easement or licence which is given by Section 48(3) of the *Water Management Act 1999* would be a “statutory power” within the meaning of Section 24(1) of the *National Parks and Wildlife Act 1970*. By virtue of this management plan this statutory power can be limited with the agreement of the body administering the legislation.

Any application to extract water from Little Waterhouse Lake is likely to be considered an action that would need to be referred to the Federal Minister for the Environment to be assessed under the Commonwealth’s *Environment Protection and Biodiversity Conservation Act 2000*.

### **Proposed Change**

**It is proposed that the following policy from Section 3.5 (Wetlands): “Monitor the pumping of water from the lakes of the reserve to ensure common law water rights are not exceeded” be re-worded as follows;**

- **Ensure that relevant water users are adhering to the requirements of the *Water Management Act 1999* in their use of water from Blackmans Lagoon.**
- **Any applications for licences to extract water for commercial purposes from lakes in the reserve would be assessed taking into account the environmental values and significance of the reserve and would not normally be approved.**

## **VEHICLE USE ON BEACHES**

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### **MAJOR ISSUE: CONFLICT BETWEEN VEHICLE USE ON BEACHES AND BIRDS**

#### Background

Many people use vehicles within the reserve to reach destinations where they undertake recreational activities such as fishing, camping or sight seeing. However, for some users the more important attraction of several of the tracks, trails and routes in the area is the challenge of driving them. Conventional two wheel drive vehicles, four-wheel drive vehicles, dune buggies and motorcycles are all used within the reserve. The plan permits recreational vehicles to drive on certain beaches within the reserve, in addition to designated roads and tracks.

Birds Australia expressed concern that opening beaches to vehicles may spread damage beyond the reserve. The Tasmanian Recreational Vehicle Association does not support the closing of areas from vehicle access. It supports the fencing of known bird rookeries as less antagonistic and more effective. The Association considers that users should be issued a general authority and allowed to self-regulate the use of vehicles on beaches. One respondent requested access to some beaches by vehicle as they are disabled.

Prior to the draft plan, recreational vehicle use was largely unregulated and those restrictions that did exist were not enforced due to lack of field management presence. With the exception of boat launching, the use of vehicles off designated routes in the reserve is currently restricted to users with a written authority issued by the Parks and Wildlife Service. The management plan grants a general authority to access the beach at authorised boat launching sites but only for the purposes of launching or retrieving boats. Beach access is strictly limited to driving on damp firm sand below the most recent high tide.

Under the plan visitors can, subject to controls, use vehicles off-road on:

1. Waterhouse Beach from the ocean end of the Blackmans Lagoon Track to the southern limit of the reserve,

2. West Tomahawk Beach from the boat launching site at the end of Homestead Road to West Wyambi Road, and
3. at authorised boat launching sites.

These routes were negotiated with recreational users groups in an attempt to find an appropriate balance between conservation and recreation. Neither of the beaches available for recreational vehicles is believed to support good habitat for nesting shorebirds. Areas that are more sensitive as bird habitat are not available for off-road vehicle use in the management plan.

### **Proposed Change**

**To meet the needs of disabled users it is proposed that the following prescription be inserted under Section 5.4 (Vehicle Use and Access) to read as follows:**

- **The Parks and Wildlife Service will have the discretion to issue individual authorities for special, limited and conditional use of recreational vehicles on non-designated routes.**

**No further change to the plan is recommended. The designated routes and access to certain beaches (with appropriate controls) are adequate to meet the needs of users and address conservation concerns.**

Contact Officer:	Gary Willmott
Position	Planning Officer
Extension	6336 5327
Date	3 December, 2001

# **Waterhouse Conservation Area Management Plan 2000**

**Summary of Public Representations  
Received during the Public Review Period  
and Director's Proposed Response**

**1 Mr Ralph Cooper**  
MC 2298 Birds Australia  
Regional Council member

7 Beach Road  
Legana TAS 7277

**Comments**

**Director's Response**

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| 1  | Two drafts in circulation, pagination is slightly different.   | An administrative error has occurred and has been corrected.   |
| 2  | In view of the high fire risk, suggestion is made to make the reserve a fuel stove only area, or use specially constructed fireplaces.   | Camp fire escapes are usually only a minor cause of wild fire ignitions. Given the popularity of campfires in this area, no change is proposed.  |
| 3  | The proposal to "encourage existing developments .." in the Recreation Zones to be removed requires a formula for how this will be achieved.   | The cited prescription relates to the Natural Zone not the Recreation Zone. The comment is noted but no change is proposed.  |
| 4  | Not providing interpretation in the Natural Zone seems anomalous as this is where the greater abundance of natural values are.   | Generally it is standing policy to limit interpretation to places of concentrated visitor activity. Visitor Service and Recreation Zones form gateways to Natural Zones and are the most appropriate places for interpretation. However, it is proposed to modify the plan to enable some limited interpretation to be provided at Little Waterhouse Lake in recognition of its special status as a Ramsar site. |
| 5  | Why is pumping allowed to continue from Blackmans Lagoon. This activity has likely to impact on habitat values.  | The limited pumping from the lagoon is on the basis of a pre-existing pumphouse licence issued under the <i>Crown Lands Act 1976</i> . The amount of water extracted has been judged by a water compliance officer to be an insignificant contributor to the reduced water levels. No change is proposed.  |
| 6  | The listing of Petrels, Prions and Albatross probably relate to beach washed specimens and has no ecological significance.   | The point is accepted and reference to these listings within the plan should be deleted.   |
| 7  | The spread of the weed Spanish Heath in the locality deserves some mention.  | This species has been identified in the reserve and Should be referred to in the plan.   |
| 8  | Camping has spread round to the back of Blackmans lagoon, it should be stopped and unofficial tracks closed.   | The plan is consistent with these points, providing for only one designated camping area at Blackmans Lagoon and the closure of several tracks. No change is proposed.   |
| 9  | Camping management prescriptions are excellent so long as they are enforced.   | Noted. The increased presence of field staff is anticipated to assist with enforcement matters. The plan also provides for the preparation of individual site plans for all camping areas in the reserve. No change is proposed.   |
| 10 | The allocation of firewood collection zones seems dangerous. Commercial options should be explored.  | The plan leaves the door open to such proposals, particularly through Section 5.12. No change is proposed.   |
| 11 | The written authority system rules are not clear.  | These matters are mostly regarded as operational, and beyond the scope of the plan, however what are currently free authorities may attract a fee in the future (as indicated in Section 5.12).  |
| 12 | Opening beaches to vehicle use may spread damage beyond the reserve (an example is given). The prescription limiting horse access to 'damp firm sand' on beaches needs to be enforced, particularly through appropriate signs. | While this point is noted, the plan has striven to find an appropriate balance between conservation and recreation. This matter is regarded as operational, and beyond the scope of the plan.  |

14 While the plan is generally positive, for it to be effective there needs to be a ranger at Bridport. A Senior Ranger was appointed in June 2001 and will be providing a greater management presence in the reserve. In addition another ranger will be re-located to the Bridport Field Centre from Mount William National Park. No change is proposed.

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**2 Mr Todd Dudley**  
MC2522

RSD  
St Marys TAS 7215

**Comments**

**Director's Response**

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| 1  | There should be a ban on netting in all watercourses and water bodies of the reserve.   | While this is noted, bycatch from the eel fishery (the only netting activity) is considered negligibly small. To prevent the inadvertent drowning of platypus or other species in the future, only eel nets fitted with a screen or set with a raised cod-end may be used in the reserve. The plan should be amended to reflect this.  |
| 2  | Trout should not be restocked in any of the lakes of the reserve. Restocking may be in contradiction to the Threatened Species Act and other legislation, since it may impact on species such as the green and gold frog. | The history of stocking of the reserve is quite long, far longer than responsibilities under this legislation. Advice received from Environment Australia is that stocking of trout in the Ramsar wetland is a pre-existing use and therefore not considered to be a relevant action under the Commonwealth's <i>Environmental Protection and Biodiversity Conservation Act 1999</i> . In addition, the connection between the green and gold frog and trout is far from clear. At this point no change to the plan is proposed until any threats can be clearly demonstrated. |
| 3  | Dogs and cats should be excluded from the reserve.  | Cats are now excluded from the reserve. Dog use is controlled under the plan. No change is proposed.   |
| 4  | Visitor infrastructure should be low key.   | This is consistent with the plan and no change is proposed.  |
| 5  | No mining should be permitted in the reserve.   | A prohibition on mining is inconsistent with the objectives defined in legislation, however the plan provides for a one hundred metre strip along the coast that excludes mineral exploration and mining. No change to the plan is proposed.   |
| 6  | No tourist resorts should be permitted in the reserve.  | The plan provides for such commercial development under closely constrained circumstances therefore no change is proposed.   |
| 7  | Investigate the use of native plants in preference to marram grass.   | This is generally consistent with the plan and no change is proposed.  |
| 8  | Horses should only be allowed on beaches.   | Under the plan horse access is limited to the publicly accessible tracks and beaches. No change is proposed.   |
| 9  | Support replacement of pine plantations with native vegetation.   | This is generally consistent with the plan and no change is proposed.  |
| 10 | Camping should remain free.   | Noted, but as this is an operational matter, no change is proposed.  |
| 11 | Composting toilets should be used in all upgrading of camping areas.  | Noted. This is regarded as an operational matter. No change is proposed.   |

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**3 Mr Ray Costello**  
MC 2658 Fly Fishes Club of Tasmania INC  
Secretary

53 Devon Hills Road  
Devon TAS 7300

**Comments**

**Director's Response**

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| 1 | Gary Willmott complimented on plan. This | Thank you. |
|---|--|------------|

consultative approach should always be employed.

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| 2 | The requirement for individual authorities for bait fishing is an unnecessary burden. A general authority should be issued.                | A general authority to bait fish at Blackmans Lagoon and Big Waterhouse Lake was proposed in the draft management plan and an individual authority system for bait fishing at Little Waterhouse Lake Ramsar site in line with the monitoring system suggested by Environment Australia and the fact that this system has been in place for several years and is accepted by anglers. It is proposed to amend the plan to provide a general authority for bait fishing in Little Waterhouse Lake in line with recommendations by this and other respondents, including IFS. |
| 3 | Powered boating on Little Waterhouse Lake should not be limited to electric outboard's only until pollution from petrol engines is proven. | Noted. The pollution caused from boating in small enclosed waterbodies is well accepted and Little Waterhouse Lake is a Ramsar wetland. No change is proposed.   |

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**4 Mr Dale Orchard**  
MC 2815

'Blumont Park'  
Nabowla TAS 7260

**Comments**

**Director's Response**

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|---|--|---|
| 1 | Congratulations on a good plan.  | Thank you.  |
| 2 | The plan provides for no special arrangements for the disabled that are unable to walk the suggested tracks. The respondents presence in the area over a 50 year period has been important to ensuring the safety of many users. | Noted, but as the area is remote and does not attract a high level of use the cost of providing tracks for disabled access cannot be justified. Most walking in the reserve is confined to beach walking and sand tracks also used by vehicles. See response below. |
| 3 | Respondent is an amputee, swims regularly and requires special consideration.  | Propose a new prescription under Section 5.4 (Vehicle Access) providing the land manager the discretion to issue individual authorities for special, limited and conditional use of recreational vehicles on non-designated routes.                                 |

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**5 Mr Eric Dolley**  
MC 2861

11 Gofton Street  
Scottsdale TAS 7260

**Comments**

**Director's Response**

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| 1 | Agree that much destruction and vandalism has occurred in the past, but not all interests have been catered for in the plan.  | Noted. No specific proposals suggested so no change is proposed.   |
| 2 | Objection is made to the naming of beach access points (Mathers, Brads, Bennetts and Langleys) after people that own shacks in the area. This respondent indicates a belief that this means the the associated shacks are being approved by the plan. | The naming was proposed and endorsed at a public meeting to minimise confusion over the location of the agreed authorised beach access points for the purpose of boat launching. It does not signal approval of any shacks. No change is proposed. |
| 3 | The track to the beach at South Croppies was built by the 'Dolleys' and should be named 'Dolleys Track'.  | The plan should be amended to include the suggested name on Map 5.   |
| 4 | Support the move to restore Aboriginal relics in the area.  | Noted.   |

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**6 Mr Stuart Campbell**  
MC 2862

3728 Waterhouse Road  
Bridport TAS 7262

**Comments**

- 1 In the historic heritage section Waterhouse is incorrectly referred to as a farm rather than as 'Waterhouse Estate' as it was normally called.
- 2 Waterhouse Estate was the only property purchased for the soldier settlement program in that area.
- 3 Mobile dunes are not a normal feature of the area, but were caused by sheep and cattle grazing. Marram grass has successfully stabilised the dunes and following stabilisation disappears as other native species become established.
- 4 The management plan must take into account the surrounding farmland. Remaining mobile dunes threatening farms should be stabilised, using marram grass.

**Director's Response**

- The plan should be corrected.
- The plan should be corrected.
- Noted, the plan in part reflects this view, although indicating that a level of dune instability is also quite normal. No change proposed.
- The Department has a policy of not using introduced species for dune stabilisation works, even though marram grass has been used extensively in the past. No change is proposed.

**7 Mr Warwick Nash**  
 MC 2975 Inland Fisheries Service  
 Deputy Director

PO Box 288  
 Moonah TAS 7009

**Comments**

- 1 Sect 2.1 (Vision and Objectives) change wording from 'undue disturbance' to detrimental impact.
- 2 Sect 2.3 (Management Zones) Information signs in the Natural Zone would be an advantage for anglers, particularly at Little Waterhouse Lake.
- 3 Sect 3.5 (Wetlands) Unsure as to the other recreational fish species you are referring to.
- 4 Sect 4.6 (Leases, licences, Written Authorities) The statement about significant platypus by-catch should be omitted unless there is proof.
- 5 The statement about concern for vertical timber stakes is a detail best left to the Eel Fishery Management Plan.
- 6 The prescription indicating conduct of the commercial eel fishery is subject to an eel fishery management plan being prepared by the licensee is inappropriate. Recommendations for rewording are included.
- 7 The proposed restrictions on bait fishing are unacceptable. It is proposed to grant a general authority allowing for bait fishing at Blackmans Lagoon and Big Waterhouse (with the conditions stipulated in the plan) and the use of artificial lures only at Little Waterhouse. This position has been revised and IFS now like to see a general authority granted for bait fishing at all three locations (see representation #16).

**Director's Response**

- Plan should be amended accordingly.
- Propose plan be amended to provide for information signs in the Natural Zone. However it is preferred that these zones remain as free of infrastructure as possible. Interpretation signs should only be provided for in the Visitor Services and Recreation Zones and at Little Waterhouse Lake in recognition of its special status as a Ramsar site.
- The species referred to are Atlantic salmon and salmon hybrids. The plan should be amended to identify them by name.
- The statement should be reworded to make its intended meaning clearer.
- This was a concern raised by many people at a public meeting and as such it is deemed appropriate to allow it to remain. No change to the plan is proposed.
- Propose the following wording be inserted into the plan "The continued conduct of any commercial eel fishery within the Waterhouse Conservation Area will be subject to a regional fishery management plan when it is developed, until then the conditions of the current licence will continue to apply".
- A general authority to bait fish at Blackmans Lagoon and Big Waterhouse Lake has been granted through the management plan. The draft plan required an individual authority be issued for bait fishing at Little Waterhouse Lake Ramsar site in line with the monitoring system suggested by Environment Australia and the fact that this system has been in place two years and is well accepted by anglers. However, it is proposed the plan be changed to reflect IFS recommendations.

8	Sect 4.8 (Statutory Powers) There is currently no regional fishery management plan.	The wording of this prescription was done on the advice of Inland Fisheries, anticipating that such a plan will be developed. No change is proposed.
9	Sect 5.4 (Vehicle Access) Concern is expressed for restriction of vehicle access to the far shore of Blackmans Lagoon.	The plan provides for a single vehicle route to the far shore of Blackmans Lagoon. The level of vehicle access is considered appropriate, therefore no change is proposed.
10	Section 5.6 (Fishing) The Service would like to keep open its options to re-stock with other species other than brown and rainbow trout.	Propose the plan be amended to provide for this.
11	Sect 5.6 Replace Commission with Service.	All references in the plan should be amended.
12	Sect 5.12 (Self-funding Activities) Adopting the user pays principle should not involve 'double-dipping'.	Agree. This concept has only been raised as one possible way in which to fund the improvement of facilities and services in the reserve. No change to the plan is proposed.

**8 Mr Peter Richards**  
MC Freshwater Anglers Council of Tasmania  
48 Stanley Street  
Summerhill TAS 7250

**Comments**

- 1 Congratulate Gary Willmott on the comprehensive document, but the consultation process is in urgent need of overhaul.
- 2 Only those matters of interest to freshwater anglers is considered in this submission.
- 3 Parks should consider providing a long drop toilet at Big Waterhouse Lake.
- 4 The shacks at Blackmans Lagoon are outside the boundaries of the plan area.
- 5 A general authority should be granted for bait fishing in the reserve.
- 6 Users of motor bikes, including four wheelers, can be a destructive and dangerous use requiring policing.
- 7 Worms, grasshoppers and cockroaches should be added to the list of allowed baits.
- 8 Boating on Little Waterhouse Lake should be either powered or unpowered. The proposed use of electric motors is an unnecessary monetary impost.

**Director's Response**

- Noted. Since no specific proposals have been suggested no change to the plan is proposed.
- Noted.
- The plan identifies the need for toilets at each of the main camping areas including Big Waterhouse Lake, therefore no change to the plan is proposed.
- As the draft plan already provides for this point no change is proposed.
- See previous comments re: bait fishing (representation #7).
- Policing is an operational matter and beyond the normal scope of a management plan, therefore no change is proposed.
- A public meeting with anglers determined that the two nominated bait species were effective and popular and with the added benefit of having a low disease risk. The other invertebrates suggested carry some disease risk and were precluded for this reason eg. worms carrying Phytophthora. Therefore no change is proposed.
- The proposal to provide users the choice of unpowered or electric powered boats was raised at a public meeting and received wide support, therefore no change is recommended.

**9 Mr Jeff Harper**  
MC 3005 Waterhouse Coastcare Group  
President  
TAS

**Comments**

- 1 Under Section 3.1 (Geodiversity) we believe the adherence to the PWS Policy of Conservation and Management Works precludes any possible chance to use superior species to halt the

**Director's Response**

The Department has a policy of not using introduced species for dune stabilisation works, even though marram grass has been used extensively in the past. Marram has now been shown to alter the shape of

- detrimental movement of sands and the clause should be removed or modified to be more Realistic.
- 2 We believe that there is neither the need nor justification to alter the Ramsar listing for Little Waterhouse Lake.
- 3 We object to the statement that most fire breaks have been established to protect shacks at Little Waterhouse Lakes, Croppies Point, Waterhouse Point and Ransons Beach. Shack owners should not be blamed nor hearsay included in the management plan.
- 4 Under Section 4.3 (Phytophthora) the proposal that all vehicles be washed down before entering the reserve is unworkable and open to abuse. We suggest the following" in the event of a quarantine order being issued by a relevant state government authority all vehicles and equipment may be asked to be washed on coming into and leaving the reserve. Any heavy machinery or vehicle that has been identified as recently been working in Phytophthora infected areas may be asked by PWS to be cleaned before coming into the reserve".
- 5 Sect 4.4 (Weeds) there is no way to prove that thistle seed has been transported in road gravel any more than the wind could have carried the seed. This paragraph should be deleted from the management plan.
- 6 We see no reason to increase the size of Waterhouse Conservation Area by amending the boundary to include Tomahawk Island and we would strongly suggest that this whole section be removed.
- 7 Under Sect 5.2 (Camping) several people enjoy camping at the North Croppies Point and there is no valid reason to close the area to camping just because it is not a heavily used area.
- 8 Prohibiting the discharge of portable toilet waste in the reserve is unworkable. The dot point should read "every attempt should be made to take portable toilet waste out of the reserve. If this is not possible or practicable then portable toilet waste should be properly and carefully disposed of in toilets provided by PWS or if no toilets are provided then a hole of suitable depth and size should be dug well away for campsites and material buried".
- dunes causing erosion to other parts of the coast. No change is proposed.
- There has been a general lack of support for this policy, including specialists within the Department, therefore it is proposed that the plan be amended to remove it.
- Propose the plan be amended to remove reference to specific shack locations.
- The prescription is intended to encourage visitors to wash down vehicles rather than requiring them to do so. Educating the public has to be the main tool for dealing with the disease. Phytophthora is already known to be present in the reserve. Issuing a quarantine order would be pointless. Limiting access to areas already infected by Phytophthora and implementing measures to control its spread into uncontaminated areas will slow the rate of spread until an effective means can be found to treat disease outbreaks. One of these measures is to encourage visitors to clean their vehicles before visiting the reserve. No change to the plan is proposed.
- Proposed that the paragraph be amended accordingly.
- Future extensions to the reserve, including Tomahawk and Waterhouse Islands and any adjacent parcels of Crown land would involve a separate consultation process. The prescription should be amended to read "Review the boundaries of the conservation area and manage adjacent and nearby Crown land to complement the reserve".
- One of the objectives of the plan is to concentrate camping in the reserve to several well used camping nodes where facilities can be provided and resources can be dedicated to their upkeep. North Croppies Point is not well used and there is not sufficient funding available to maintain the area for camping in the long term for such a small number of users. Therefore no change to the plan is proposed.
- Long drop toilets have been provided at Blackmans Lagoon, two areas at Waterhouse Point and at Ransons Beach. The issue of waste management can only be resolved when the number and location of campsites have been rationalised and a system put in place to regulate the amount and length of camping stays. In the interim facilities exist for the disposal of sewerage at both Scottsdale and St Helens. The disposal of chemicals used in portable toilets into long drops or pits is unacceptable in terms of water quality impacts and the risk to human health. For those visitors choosing to use other areas with no facilities for a long period of time then it is not unreasonable for them to carry portable toilets and to dispose of the waste outside the reserve on a regular

basis. No change is proposed.

9 Investigate the possibility of further improving launching facilities at all major camping zones.

A boat launching facility at Blizzards Landing was not supported by Marine and Safety Tasmania. Unless PWS is able to secure funding through some other means such as a user pays system then the facility cannot be provided in the short term. No change is proposed.

10 Sect 5.4 (Vehicle Use) There is an error in location identification of Ransons Beach. It is in fact called West Tomahawk Beach.

The plan should be corrected.

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**10 Mr Raymond Nias**

MC 3106 The World Wide Fund for Nature,

TAS

**Comments**

**Director's Response**

1 This plan focuses on wetland management issues, and while the draft contributes valuably in this area, it could be stronger in several areas.

Noted.

2 The plan fails to mention that Blackmans Lagoon is listed in the 'Directory of Important Wetlands in Australia', and is not protected in the same way as Little Waterhouse.

The plan should be amended to indicate the designation of Blackmans Lagoon as requested.

3 Sect 2.3 (Management Zoning) The protection of Little Waterhouse Lake through 'appropriate zoning' is not properly explained in the plan.

The zones are designated in Map 3. This map shows the Natural Zone extending across the lake and includes the entire Ramsar site as well as some seasonal wetlands to the south. No change proposed.

4 Sect 2.3 Big Waterhouse Lake has been omitted from the Recreation Zone in Table 1.

This should be rectified.

5 Sect 2.3 Clarification is needed on what existing development is contained within the Natural Zone and referred to in the prescriptions.

This development refers to the three shacks adjacent to Little Waterhouse Lake. However the future of these shacks is to be considered under the state-wide shack categorisation process. No change is proposed.

6 Sect 3.5 (Wetlands) How is the level of water extraction from Blackmans Lagoon proposed to be monitored? While the level of extraction may fall within existing rights, it may be too high during dry periods to maintain environmental flows.

The first matter is an operational issue. Expert advice indicates that the current level of extraction is far lower than natural loss by evaporation. No change is proposed.

7 Sect 3.5 At present neither of the Waterhouse Lakes is used for extraction, it is recommended that a clause be inserted in the plan to ensure this remains the case.

It is very unlikely that a licence would ever be granted to extract water from Little Waterhouse Lake under the *Water Management Act 1999*. An application to extract water from Little Waterhouse Lake may be considered an action under the EPBC Act given that it is a Ramsar site. The Water Management Act states that a person who is an occupier of a tenement to which a riparian tenement might usually apply does not necessarily confer any rights over a riparian Crown reserve ie. Waterhouse Conservation Area, however the Secretary the Department administering *Crown Land Act 1976* ie. DPIWE may grant an easement or licence over the reserve for the taking of water. It is proposed to include a prescription indicating that any application to extract water for commercial purposes would take account of the values and significance of the reserve and would not normally be approved.

8 Sect 3.5 The mobile dune infill of Big Waterhouse Lake, acknowledged in the plan,

The plan does not preclude future action being taken on this matter, therefore no change is proposed.

needs remedial action. This requires practical decisions about suitable techniques. WWF would be pleased to assist.

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|----|--|--|
| 9  | Sect 3.5 Concern is expressed for the prescription that indicates preparation of a recommendation to alter the listing criteria used for the Ramsar listing of Little Waterhouse Lake.   | Propose that this prescription be removed from the plan.   |
| 10 | Sect 4.2 (Introduced Fauna) It is recommended that restocking of Little Waterhouse Lake with trout be discontinued. The impact of trout fishing on Blackmans Lagoon requires thorough research.  | This is not supported by the Inland Fisheries Service. Little Waterhouse Lake was listed as a Ramsar site even though trout had been present in the lake for many years. The plan should be amended to include a new prescription which provides for continuing liaison with Inland Fisheries with respect to assessment and monitoring of potential impacts of trout and salmon in the reserve.             |
| 11 | Sect 4.6 (Leases, licences) It is recommended that eel restocking of Little Waterhouse Lake be discontinued. The impact of eel restocking on Blackmans Lagoon requires thorough research.  | This is not supported by the Inland Fisheries Service. The plan should be amended to read that continuation of commercial eel fishery will be subject to a regional fishery management plan.   |
| 12 | Sect 5.3 (Shacks) Removal of shacks on the edge of Little Waterhouse Lake would significantly benefit the site, alternatively work closely with licence holders to ensure high environmental standards.  | The removal of shacks is subject to a separate government process and outside the scope of this management plan. The second matter is an operational issue. No change is proposed.   |
| 13 | Sect 5.4 (Vehicle Access) Measures will be needed to ensure track closures at Little Waterhouse Lake are effective.  | Operational matters are outside the scope of this management plan, therefore no change is proposed.  |
| 14 | Sect 5.6 (Fishing) What measures are proposed to regulate day to day use of bait fishing.  | Operational matters are outside the scope of a management plan, therefore no change is proposed.   |
| 15 | Sect 5.6 The fifth dot point in the prescriptions contains a reference to procedures that do not appear to exist. Elaborating this point, WWF is further concerned that scarce resources be used for manipulative changes be made to enhance fishing rather than to better manage conservation values. | Section 4.9 sets out procedures in general, therefore no change proposed. The allocation of resources is a matter for the State Government and is outside the scope of this plan.  |
| 16 | Sect 5.7 (Hunting) When will Tasmania implement the phase-out of lead shot?  | This is a matter outside the scope of this management plan, therefore no change is proposed.   |
| 17 | Sect 6.1 (Community Support) Community consultation on preparation of this plan appears to have been extremely limited. WWF would welcome the opportunity to work with the PWS to ensure the best possible conservation outcomes.  | There has been considerable community consultation undertaken during the drafting of the management plan and this can be demonstrated. PWS is happy to work with WWF to further conservation outcomes for the wetlands in the reserve. No change to the plan is proposed.  |
| 18 | Sect 6.3 (Plan Implementation) The weakest aspect of the plan is the lack of resources available to implement it, particularly on-ground ranger staff. Plan needs to outline support and timeframes for implementation.  | A Senior Ranger has been appointed and additional field staff re-located to Bridport to help achieve the objectives of the plan. An implementation schedule stating the nature of the task and its priority should be included in Appendix 1. However strict timeframes and costing cannot be included in this schedule as the plan is a statutory document and cannot make long term budgetary commitments. |

<b>Comments</b>	<b>Director's Response</b>
1 Many sections of the plan are endorsed.	Noted.
2 Sect 3.4 (Fauna) Rather than completely close off areas where birds are breeding it may be better to barrier known bird breeding areas.	Noted, however considerable community consultation was made before recommending closure, and for the most part has been supported, therefore no change is proposed.
3 Sect 3.6 (Aboriginal Heritage) Through a cooperative approach much can be achieved.	Noted, no change required.
4 Sect 4.1 (Fire Management) TRVA would like to participate on bush fire prevention working bees in conjunction with other players.	This is largely an operational matter and beyond the normal scope of a management plan, however the offer of assistance has been relayed to the District Manager. No change is proposed.
5 Sect 4.1 TRVA would like to participate in weed and phytophthora working bees .	This is largely an operational matter and beyond the normal scope of a management plan, however the offer of assistance has been relayed to the District Manager. No change is proposed.
6 Sect 5.1 (Visitors) If vehicles must be cleaned outside the reserve then a wash bay will need to be provided.	It is the responsibility of drivers to remove excess soil from the body and wheels of their vehicles before entering the reserve. It is unrealistic and cost prohibitive to provide wash bays to every reserve in the State which has vehicle access. No change is proposed.
7 Sect 5.2 (Camping) A general meeting must be undertaken in the area before any camping restrictions are put in place.	Section 5.2 (first prescription) provides for this point therefore no change proposed.
8 Sec 5.2 There is a conflict between the creation of new camping areas and the prescription limiting camping areas.	A rewording of the prescriptions under Sect 2.3 (Zoning) is proposed to make it clear that camping (including the possibility of new areas) is allowable within the Visitor Service Zones.
9 Sec 5.4 (Vehicles) Do not support closing of areas from vehicle access. Fencing off known bird rookeries is much less antagonistic and effective.	See response to point #2 above.
10 Sec 5.4 Users should be issued a general authority and allowed to self-regulate the use of vehicles on beaches.	This view is noted, but given the broad divergence of views no change is proposed.
11 Sec 5.4 Consider having a non-sensitive dune area available for recreation use.	This idea has been suggested several times and has some merit. However discussions with field staff has not identified any areas in the reserve that would be suitable for this purpose without causing significant damage. This matter probably needs to be considered at a regional level rather than just for the reserve. Therefore no change to the plan is recommended.
12 Sec 5.5 (Walking) It is unfair that pedestrians have absolute right of way.	This view is noted, but given that this is a basic safety issue no change is proposed.

**12 Mr Wally Alexander**  
MC 3129

PO Box 14  
Ringarooma TAS 7263

<b>Comments</b>	<b>Director's Response</b>
1 The respondent rides with Waterways Trail Blazers. He indicates the proposed management plan poses some problems for horse riders, as detailed below.	The matters raised here are largely operational and beyond the normal scope of a management plan. No change is proposed.

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| 2 | Arranging a permit for horseriding should be easier.   | Written authorities to horseride in the reserve are available from Bridport, St Helens and Launceston. Launceston is normally open during office hours. |
| 3 | The timing should not be fixed to a single day.  | The current authority provides for 7 days of flexibility around the nominated trip date.  |
| 4 | The locations where permits are available should be handy for users (they should be available by post) | Efforts have been made to make it easy to get an authority (most authorities for horseriding can be issued through the post).                           |

**13 Mr Michael Lynch**

MC 3148 Tasmanian Conservation Trust  
Director

102 Bathurst Street  
Hobart TAS 7000

**Comments**

**Director's Response**

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| 1 | Very disappointed the plan is not being referred to the RPDC in line with the Davis Report.  | Legislative amendments have been made to achieve this and representations on this plan are being referred to the RPDC.   |
| 2 | Further disappointed the plan does not allow for the establishment of a Conservation Management Trust. The principle of Trusts is supported with some caveats.   | This view is noted, but given the broad divergence of views on management of the reserve no change is proposed.  |
| 3 | The issues in the Waterhouse CA seem very similar to those in the Arthur-Pieman, so many of the comments made on that plan are relevant here.  | Noted, no change proposed since the plan largely reflects management arrangements determined jointly with major user groups.   |
| 4 | The plan cannot be realised without adequate resources. It is essential that the plan identify the tasks to be carried out, the cost of each task, the timing of implementation and the means of funding. Without this the plan cannot be supported. | The need for development of tighter links between management plans and day to day operational activities is acknowledged, and this is being achieved through District operational planning. However, generally the points being made here are considered beyond the scope of a statutory management plan. Propose new Appendix identifying the key actions and priorities for future management in the reserve. No further changes are proposed. |

**14 Mr John Dickson**

MC 3140 Tasmanian Aboriginal Land Council  
Acting Manager

PO Box 386  
North Hobart TAS 7002

**Comments**

**Director's Response**

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| 1 | Summary Section - The single referral to Aboriginal values under heritage values denies contemporary use patterns. Suggested text is given.  | The suggested text is already in the plan under Section 3.7 (Aboriginal Heritage) under the heading 'social values'. However some rewording of the summary is proposed to acknowledge these contemporary Aboriginal values.  |
| 2 | Sect 2.3 (Management Zones) Provision should be made for Aboriginal cultural use of plants, animals and materials across the entire reserve.   | The Parks and Wildlife Service, recognising the basis for this claim, has committed itself to addressing solutions at a number of levels, ie the WHA plan joint policy on Animal, Plant and Material Use. No change is recommended until such time as a State wide policy has been ratified. |
| 3 | Sect 4.1(Fire Management) The prescription about preparing a map of Aboriginal heritage sensitivity zones to aid in fire response is not supported. The primary emphasis should be on consultation with TALC and involvement of the Aboriginal community in fire management. | Propose that this prescription be removed as requested.  |
| 4 | Sect 4.7 (Prospectivity and Mining) The 100  | This view is noted, but given the broad divergence of  |

metre wide coastal buffer strip that excludes mineral exploration and mining may not be wide enough.

views no change is proposed. It should also be remembered that Mining and Mineral Exploration companies have obligations to protect Aboriginal artefacts under the *Aboriginal Relics Act 1975*.

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| 5 | Sect 5.2 (Camping) The wording indicating only some camping areas are located over Aboriginal sites is inconsistent with TALC information that indicates the majority of camping areas are so located. The assertion that camping may be damaging values is also incorrect, as values are being damaged. All impacts should be removed. | Information in the plan is based on a recent Aboriginal heritage survey of the reserve. It is proposed to modify text to indicate that values are being damaged and that, in cooperation with users, efforts will be made to avoid or mitigate impacts.  |
| 6 | Sect 5.4 (Vehicle Use) The Aboriginal Relics Act was enacted in 1975 not 1974.  | The plan should be amended to correct this error.  |
| 7 | Sect 5.4 Aboriginal heritage degradation by vehicles has not been surveyed or researched. Tracks impacting on values should be closed and rehabilitated.  | A recent Aboriginal heritage survey of the Reserve included an assessment of the tracks of the Reserve. Several specific prescriptions relate to this survey and have resulted in negotiated outcomes (ie. measures proposed for the South Croppies Point Track under Section 5.4). No change is proposed.               |
| 8 | Boat launching from beaches should be for emergency purposes only.  | This view is noted, but given the broad divergence of views no change is proposed.   |
| 9 | Before a permit is issued for off-road use, users should be informed of the provisions of the Aboriginal Relics Act.  | References have been made under Sections 3.6 and 5.11 to educating visitors about the protection afforded to Aboriginal sites under the <i>Aboriginal Relics Act 1975</i> . In addition, the current written authority informs holders of the need to respect sites and of the existence of the Act. No change proposed. |

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**15 Mr Mark Butz**

MC Environment Australia (Wetlands Program)  
Director

GPO Box 787  
Canberra ACT 2601

**Comments**

**Director's Response**

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| 1 | Under the summary page, overgrazing, spread of exotic invasive plant species and drainage for agriculture and filling are significant threats to Little Waterhouse Lake. These threats also apply to the entire conservation area and should be included in this section.   | The plan should be amended as requested.   |
| 2 | Overview, it may be useful to, under the heading of International Context, to provide a background to the Ramsar Convention and Australia's obligations under the Convention in this section.   | The plan should be amended as requested.   |
| 3 | A comprehensive description of Little Waterhouse Lake and the values for which it was listed should be included in Section 3.5 – Wetlands.  | Propose including the Ramsar Information Sheet for Little Waterhouse Lake in Appendix 3.   |
| 4 | Page 24 (Wetlands) the working title of the Convention is the Convention on Wetlands (Ramsar, Iran, 1971). The additional wording is no longer commonly used as the Convention has broadened its scope to include all aspects of wetland conservation and wise use. As of 20 September 2000, Australia has 53 Ramsar sites, not 49 as stated. | The plan should be amended as requested.   |
| 5 | Prescriptions under the eel fishing section should address the lack of understanding of this practice and include provisions for further  | The regional fishery management plan to be prepared by the Inland Fisheries Service will address the level of eel stocking to ensure sustainable harvesting as |

research into the impacts of eeling to inform future management decisions.

well as any impacts on flora and fauna values. This should help to clarify whether the current level of eel stocking is consistent with the management objectives of the reserve and our obligations under the Ramsar Convention. It is proposed the plan be amended to reflect this.

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| 6  | Sect 5.6 (Fishing) The plan acknowledges that special consideration be given to the impact of the trout fishery on Little Waterhouse Lake. There are however no management prescriptions that monitor or assess the potential impacts of the trout fishery.  | Propose new action under Section 5.6 "Liase with the Inland Fisheries Service with regard to assessment and monitoring of potential environmental impacts of the trout and salmon fishery in the reserve".   |
| 7  | It may be useful to include the Ramsar Information Sheet (RIS) for the Little Waterhouse Lake Ramsar site as an attachment to the management plan.   | The RIS should be added as an appendix to the plan.  |
| 8  | A detailed map showing the boundaries of the Ramsar site should be included to identify, within context, the position and size of the of the Ramsar site.  | The plan should be amended as requested.   |
| 9  | The size of the Little Waterhouse Lake Ramsar site is 56 ha. This section should be included in Section 3.5 (Wetlands).  | The plan should be amended as requested.   |
| 10 | To facilitate implementation of the plan an implementation schedule should be devised. Each action should be assigned a priority ranking (ie. High, medium, low); a time frame for its expected completion date; and a list of the people/agencies who will be responsible for undertaking the action. | Implementation priorities should be identified in an Appendix. Timeframes and responsibilities are operational matters reliant on available resources to implement and are dealt with in subsequent operational planning.  |
| 11 | While the draft plan provides for the management of the Ramsar site, the policies and management prescriptions associated with the management of the Ramsar wetland are not site specific or easily identifiable as often they are contained in different sections.                                    | Agreed. It is proposed that the prescriptions relevant to the management of the Ramsar wetland be brought together under Section 3.5, Ramsar Wetland Management.   |
| 12 | We would suggest that policies and direct management prescriptions be developed and included under one heading which addresses the significance, protection and management of the Little Waterhouse Lake Ramsar site.  | The plan reflects an integrated approach to management for the entire reserve. It is proposed, where possible, that the plan be modified to address issues which specifically relate to management of the Little Waterhouse Lake Ramsar site. These should then be grouped under one heading in Section 3.5. |
| 13 | The plan also needs to acknowledge the recent commencement of the Commonwealth's <i>Environment Protection and Biodiversity Conservation Act 1999</i> .  | Propose that the overview section of the plan be amended as requested.   |
| 14 | I suggest that environmental assessment and approval requirements for actions likely to have a significant impact on Ramsar wetlands and listed species are reflected in the management plan.  | Propose that suggested wording be included as a policy under Section 3.4 (Fauna) and 3.5 (Wetlands).   |

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**16 Mr Greg McCrossen**  
MC Inland Fisheries Service  
Director

PO Box 288  
Moonah TAS 7009

**Comments**

**Director's Response**

1 Little Waterhouse Lake should remain as a bait fishing water. IFS would like to see a general

Little Waterhouse Lake should remain available for bait fishing. In recognition of concerns by IFS & some angling groups,

authority granted for bait fishing at all three locations in the conservation area. This should be given effect through the management plan. The Service strongly opposes the use of individual permits.

the individual authority system that has been in place for two years and is accepted by anglers will be replaced by a general authority for bait fishing at the three lakes in the conservation area, granted through the management plan.

- 2 We require that the species of fish to be stocked for recreational purposes in these lakes, including Little Waterhouse to include salmonoids and hybrids thereof.

The plan should be amended to allow for the continued stocking of brown and rainbow trout, salmon and salmon hybrids, subject to Inland Fisheries Service regulations.

**17 Mr Tim Bullard**  
MC Legal Officer

GPO Box 825  
Crown Law Hobart TAS 7001

**Comments**

- 1 Page ii, Paragraph 3 should be amended by deleting the last sentence. The inclusion of this information is unnecessary and may cause confusion should the position of Director change.
- 2 Page 11, Paragraph 2.2 although you include a statement of the purposes of Conservation Areas as now found in the schedule to the National Parks and Wildlife Act 1970, S2.1(bb) of the Act requires that you include the actual purposes for which the land was originally reserved (these may not necessarily align with those now included in the Act).
- 3 Section 21(bca) of the Act requires that the reasons for which any of the management objectives for that class of reserved land have or have not been specified be included.
- 4 The sentence "The Director may be liable for damage or injury incurred to the person or property of another which arises from a failure to discharge that duty" should be deleted.

**Director's Response**

- The plan should be amended as requested.
- The plan should be amended as requested.
- These reasons are set out throughout the plan and the relevant sections referred to after each of management objectives under Section 2.2. A statement should be included in the plan to make this link more obvious.
- The plan should be amended as requested.

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**18 Mr Bruce Davis**  
MC National Parks and Wildlife Advisory Council  
Chairperson

GPO Box 44A, Hobart TAS 7001

**Comments**

- 1 The Waterhouse plan should not be released until details have been compared with the Final Recommendations Report of the RPDC for the Arthur Pieman area, especially with respect to Aboriginal cultural heritage, 4WD tracks and camping provisions.
- 2 It is pleasing to note that staff resources will be committed to the Waterhouse area.
- 3 General proposals re: camping are acceptable, but there is a need for clearer identification of sites, a booking system in the peak period and the prevention of physical fixtures and limits on tenure associated with the long-term visitors.
- 4 Fire management is of key concern and the management plan appears rather complacent about campfire situations. There are seasons when open fires should not be permitted.
- 5 It is claimed that the level and quality of lakes and lagoons will be monitored as well as the off-take of water to private properties, but no indication of who will be responsible for this and how it will be accomplished. This is a crucial aspect of the Ramsar site and more and more specific information is required.

**Director's Response**

- The two plans have been compared. It is felt that the Waterhouse plan adequately addresses most of the concerns raised. All of the proposals in the plan have been negotiated with the various users and interest groups and have been agreed to in principle. Therefore no change is proposed.
- Noted.
- The plan makes provision on all of these points. No change to the plan is proposed.
- A prescription under the camping section provides for the standardisation of fire places at individual campsites, allowing camp fires only at these locations. In addition, the plan states that "fires will be prohibited in the reserve during periods of high to extreme fire danger, as well as during days of Total Fire Ban". No change to the plan is proposed.
- The only water currently extracted is from Blackmans Lagoon. The present rates of extraction from Blackmans are not believed by Water Division staff to be excessive. Staff from the Water Division advise that there is no requirement to report on the amount of water extracted for domestic supply. It is proposed to amend the plan to require water users to adhere

to the *Water Management Act 1999*.

6 With regard to trout fishing in the reserve, the phraseology of the plan indicates that PWS is reluctant to face this issue. To what extent has the PWS engaged in discussion with Inland Fisheries about strategic policy, as distinct from individual case instances.

Agree that trout fishing on reserved land needs to be addressed at a broader agency level between PWS and Inland Fisheries. The IFS has made it quite clear over the last few years that it supports continued recreational fishing (including bait fishing) and stocking of waterbodies in conservation areas and other reserved land. In respect to Waterhouse, the Inland Fisheries Act authorises IFS to introduce recreational fish species into the freshwater wetlands of the reserve unless this statutory power is restricted by the management plan, which can only be done with the agreement of IFS. IFS has made it clear on numerous occasions that it will not accept such a restriction.

It is proposed to add a new prescription under Section 3.5 (Wetlands) and Section 5.6 (Fishing) to provide for continuing liaison with Inland Fisheries with respect to assessment and monitoring of potential environmental impacts of the trout and salmon fishery in the reserve.

7 The issue of community support warrants more detail. What are the spectrums of consultation and dispute resolution mechanisms which will be used.

It is proposed that the plan be modified to identify a number of mechanisms to encourage community involvement with respect to the future management of the reserve. These mechanisms should be detailed under Section 6.1.

8 As Waterhouse is an important area for locals and recreational users, I would like to see a management body set up for the area with strong local and user groups representation on it.

Given the broad divergence of views on the management of the reserve, no change is proposed. The Waterhouse Coastcare Group has been established and encouraged by the NE Coastcare Facilitator and PWS to provide a more structured avenue for involvement of locals and user groups in reserve management.



**National Parks And Wildlife Act 1970**

**Schedule 4 - Objectives for management of reserved land (extract)**

5. Conservation area

The following objectives:

- (a) to conserve natural biological diversity;
- (b) to conserve geological diversity;
- (c) to preserve the quality of water and protect catchments;
- (d) to conserve sites or areas of cultural significance;
- (e) to provide for the controlled use of natural resources, including as an adjunct to utilisation of marine resources;
- (f) to provide for exploration activities and utilisation of mineral resources;
- (g) to provide for the taking, on an ecologically sustainable basis, of designated game species for commercial or private purposes, or both;
- (h) to provide for other commercial or industrial uses of coastal areas;
- (i) to encourage education based on the purposes of reservation and the natural or cultural values of the conservation area, or both;
- (j) to encourage research, particularly that which furthers the purposes of reservation;
- (k) to protect the conservation area against, and rehabilitate the conservation area following, adverse impacts such as those of fire, introduced species, diseases and soil erosion on the conservation area's natural and cultural values and on assets within and adjacent to the conservation area;
- (l) to encourage appropriate tourism, recreational use and enjoyment (including private uses) consistent with the conservation of the conservation area's natural and cultural values;
- (m) to encourage cooperative management programs with Aboriginal people in areas of significance to them in a manner consistent with the purposes of reservation and the other management objectives.

**Environment Protection and Biodiversity Conservation Regulations 2000**

**Schedule 6 - Managing wetlands of international importance**

1 General principles

1.01 The primary purpose of management of a declared Ramsar wetland must be, in accordance with the Ramsar Convention:

- (a) to describe and maintain the ecological character of the wetland; and
- (b) to formulate and implement planning that promotes:
  - (i) conservation of the wetland; and
  - (ii) wise and sustainable use of the wetland for the benefit of humanity in a way that is compatible with maintenance of the natural properties of the ecosystem.

1.02 Wetland management should provide for public consultation on decisions and actions that may have a significant impact on the wetland.

1.03 Wetland management should make special provision, if appropriate, for the involvement of people who:

- (a) have a particular interest in the wetland; and
- (b) may be affected by the management of the wetland.

1.04 Wetland management should provide for continuing community and technical input.

2 Management planning

2.01 At least 1 management plan should be prepared for each declared Ramsar wetland.

2.02 A management plan for a declared Ramsar wetland should:

- (a) describe its ecological character; and
- (b) state the characteristics that make it a wetland of international importance under the Ramsar Convention; and
- (c) state what must be done to maintain its ecological character; and
- (d) promote its conservation and sustainable use for the benefit of humanity in a way that is compatible with maintenance of the natural properties of the ecosystem; and

- (e) state mechanisms to deal with the impacts of actions that individually or cumulatively endanger its ecological character, including risks arising from:
  - (i) physical loss, modification or encroachment on the wetland; or
  - (ii) loss of biodiversity; or
  - (iii) pollution and nutrient input; or
  - (iv) changes to water regimes; or
  - (v) utilisation of resources; or
  - (vi) introduction of invasive species; and
- (f) state whether the wetland needs restoration or rehabilitation; and
- (g) if restoration or rehabilitation is needed — explain how the plan provides for restoration or rehabilitation; and
- (h) provide for continuing monitoring and reporting on the state of its ecological character; and
- (i) be based on an integrated catchment management approach; and
- (j) include adequate processes for public consultation on the elements of the plan; and
- (k) be reviewed at intervals of not more than 7 years.

### 3 Environmental impact assessment and approval

3.01 This principle applies to the assessment of an action that is likely to have a significant impact on the ecological character of a Ramsar wetland (whether the action is to occur inside the wetland or not).

3.02 Before the action is taken, the likely environmental impact of the action on the wetland's ecological character should be assessed under a statutory environmental impact assessment and approval process.

3.03 The assessment process should:

- (a) identify any part of the ecological character of the wetland that is likely to be affected by the action; and
- (b) examine how the ecological character of the wetland might be affected; and
- (c) provide adequate opportunity for public consultation.

3.04 An action should not be approved if it would be inconsistent with:

- (a) maintaining the ecological character of the wetland; or
- (b) providing for the conservation and sustainable use of the wetland.

3.05 Approval of the action should be subject to conditions, if necessary, to ensure that the ecological character of the wetland is maintained.

3.06 The action should be monitored by the authority responsible for giving the approval (or another appropriate authority) and, if necessary, enforcement action should be taken to ensure compliance with the conditions.