

CHAPTER 2



The Matrix

A Comparison of International Wilderness Laws

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Summary

The following matrix provides a comparison of wilderness laws around the world. This matrix is divided into four parts, each focusing on a key area of wilderness legislation: the definition of wilderness; the overall legislative purpose; uses allowed by the legislation; and administration and management requirements under law. A more thorough analysis of individual wilderness laws follows in the ensuing chapters. The purpose of this matrix is to provide a highly condensed overview of the subject matter and to facilitate quick comparisons of the different approaches used in different countries or states/provinces.

Another important point is that the matrix focuses only on what is made explicit in the wilderness laws themselves. Thus, where the statute itself is silent on one of the issues in the matrix, we use the caption “not identified.”

The matrices are largely self-explanatory, though a few brief notes are in order. First, the laws used in this exercise are listed in the first section in the left hand column. The names of the laws are not repeated in the three subsequent sections. For Australia and Canada, two countries in which state and provincial law are central given that

most land is not held by the federal government, we included the states of New South Wales and South Australia for Australia, and the provinces of Ontario and Newfoundland and Labrador for Canada. These are also discussed at greater length in the ensuing case studies. We did not include state wilderness laws in the United States, as most wilderness protection occurs at the federal level, and all laws subsequent to the Wilderness Act of 1964 specify that the newly designated wilderness areas will be managed according to the provisions of the 1964 Wilderness Act. We do include the Mission Mountains Wilderness Area, established by The Confederated Salish and Kootenai Tribes in Montana, U.S., on their reservation lands, in this matrix. We have also chosen to include Mexico's wilderness definition, even though, as the chapter on Mexico below indicates, the final modalities for Mexico's wilderness protection programs have not yet been finalized.

Finally, two of the columns listed in Matrix D might require additional clarification. The first is the "Minimum Necessary Management Tool" column, which refers to a requirement in the United States, and also used by the Confederated Salish and Kootenai Tribes, that the least intrusive management tools be used in wilderness area. For example, hand tools such as axes and saws are favored over mechanical tools.

Matrix A: Definitions			Page 1
Country	Law	Legislated Definition of Wilderness	
Australia	National Parks and Wildlife Conservation Act of 1975	Not identified	
Australia--State of New South Wales	Wilderness Act of 1987	<ul style="list-style-type: none"> a. the area is, together with its plant and animal communities, in a state that has not been substantially modified by humans and their works or is capable of being restored to such a state; b. the area is of sufficient size to make its maintenance in such a state feasible; and c. the area is capable of providing opportunities for solitude and appropriate self-reliant recreation. 	
Australia--State of South Australia	Wilderness Protection Act of 1992	<ul style="list-style-type: none"> a. the land and its ecosystems must not have been affected, or must have been affected to only a minor extent, by modern technology; b. the land and its ecosystem must not have been seriously affected by exotic animals or plants or other exotic organisms. [Sec. 3(2)] 	
Canada	Canada National Parks Act of 2000 [Chapter 32, Section 14]	... any area of a park that exists in a natural state or that is capable of returning to a natural state [Section 14(1)].	
Canada--Province of Ontario	Provincial Parks and Conservation Reserves Act, 2006	The objective of wilderness class parks is to protect large areas where the forces of nature can exist freely and visitors travel by non-mechanized means, except as may be permitted by regulation,	

Matrix A: Definitions		Page 2
Country	Law	Legislated Definition of Wilderness
Canada--Province of Ontario, <i>continued</i>		while engaging in low-impact recreation to experience solitude, challenge and integration with nature. 2006, c. 12, s. 8 (2).
Canada--Province of Newfoundland and Labrador	Wilderness and Ecological Reserves Act	<p>The Lieutenant-Governor in Council may set aside, as wilderness reserves, areas of the province that are subject to no or little human activity,</p> <p>a. to provide for the continued existence of those areas as large wilderness areas to which people may come and in which they may hunt, fish, travel and otherwise experience and appreciate a natural environment;</p> <p>b. to allow within those areas undisturbed interactions of living things and their environment;</p> <p>c. to preserve those large areas that may be necessary for the continued survival of a particular species; or</p> <p>d. to protect those areas with primitive or extraordinary characteristics. [Section 4]</p>
Confederated Salish and Kootenai Tribes	Mission Mountain Tribal Wilderness Ordinance 79A of 1982 and Resolution 82-173	A wilderness is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined as an area of undeveloped tribal land, retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions. [Section 2]

Matrix A: Definitions			Page 3
Country	Law	Legislated Definition of Wilderness	
Finland	Act on Wilderness Reserves of 1991	Wilderness areas comprise the areas listed in Section 3. [Section 1]	
Iceland	Nature Conservation Act of 1999	An area of land at least 25km ² in size, or in which it is possible to enjoy the solitude and nature without disturbance from manmade structures or the traffic of motorized vehicles on the ground, which is at least 5 km away from manmade structures or other evidence of technology, such as power lines, power stations, reservoirs, and main roads, where no direct indications of human activity are visible and nature can develop without anthropogenic pressures. [Article 3(4)]	
Japan	Nature Conservation Law of 1972	Area that preserves its original characteristics without any influence of human activities.	
Mexico		Areas where habitats, biotic communities, and natural processes remain predominantly intact; where the footprint of industrial civilization and its infrastructure is not present; where human activities are developed without leaving evidence of their presence; and, are sufficiently ample to provide opportunities for the reconciliation of man as a species with nature.	
New Zealand	Wilderness Policy of 1985	They will be large enough take at least 2 days' foot travel to traverse; They should have clearly defined topographic boundaries and be adequately buffered so as to be unaffected, except in minor	

Matrix A: Definitions		
Country	Law	Legislated Definition of Wilderness
New Zealand <i>continued</i>		ways, by human influences; They will not have developments such as huts, tracks, bridges, signs, nor mechanized access.
Russia	Federal Law on Specially Protected Natural Areas of 1995	On the territory of strict state nature preserves (zapovedniki), the following is completely withdrawn from economic utilization: specially protected natural areas, complexes, and objects (land, water, mineral resources, the plant and animal worlds) which have protected status; areas with scientific or environmental/ecological educational significance as models of natural environment; typical or rare landscapes; and areas for the preservation of genetic funds of plants and animals. [Article 6(1)]
South Africa	National Environmental Management: Protected Areas Act of 2003 and Protected Areas Amendment Act of 2004	... an area designated in terms of section 22 or 26 (to protect and maintain the natural character of the environment, biodiversity, associated natural and cultural resources and the provision of environmental goods and services; to provide outstanding opportunities for solitude; to control access which, if allowed, may only be by non-mechanized means.)
Sri Lanka	National Wilderness Heritage Areas Act of 1988	Not identified, but see Matrix B
United States	Wilderness Act of 1964	A wilderness, in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where

Matrix A: Definitions

Country	Law	Legislated Definition of Wilderness
<p>United States <i>continued</i></p>		<p>man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least [two thousand hectares or] five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value. [Sec.2(c)]</p>

Matrix B: Legislative Purpose		Page 1
Country	Goal(s) of Wilderness Legislation	
Australia	A wilderness zone shall be maintained in its natural state and shall be used only for scientific research authorized by the Director and such recreational and other purposes, other than the recovery of minerals, as are specified in the plan of management relating to the wilderness zone [Section 10(5)].	
Australia--State of New South Wales	<ol style="list-style-type: none"> a. to provide for the permanent protection of wilderness areas, b. to provide for the proper management of wilderness areas, c. to promote the education of the public in the appreciation, protection and management of wilderness [Section 3] 	
Australia--State of South Australia	An Act to provide for the protection of wilderness and the restoration of land to its condition before European colonization; and for other purposes.	
Canada	Not identified	
Canada--Province of Ontario	<p>See definition under Ontario in Matrix A above. The objectives of Provincial Parks generally, including Wilderness Class Parks, are:</p> <ol style="list-style-type: none"> 1. To permanently protect representative ecosystems, biodiversity and provincially significant elements of Ontario's natural and cultural heritage and to manage these areas to ensure that ecological integrity is maintained. 2. To provide opportunities for ecologically sustainable outdoor recreation and encourage associated economic benefits. 3. To provide opportunities for residents of Ontario and visitors to increase their knowledge and appreciation of Ontario's natural and cultural heritage. 4. To facilitate scientific research and to provide points of reference to support monitoring of ecological change on the broader landscape. [Section 2] 	

Matrix B: Legislative Purpose		Page 2
Country	Goal(s) of Wilderness Legislation	
Canada–Province of Ontario, <i>continued</i>	<p>And: Ontario’s provincial parks and conservation reserves are dedicated to the people of Ontario and visitors for their inspiration, education, health, recreational enjoyment and other benefits with the intention that these areas shall be managed to maintain their ecological integrity and to leave them unimpaired for future generations. [Section 6]</p>	
Canada–Province of Newfoundland and Labrador	<p>See definition under Newfoundland and Labrador in Matrix A above.</p>	
Confederated Salish and Kootenai Tribes	<p>It is the principle objective of this Ordinance to protect and preserve an area of land in its natural conditions in perpetuity. This Wilderness shall be devoted to the purposes of recreational, scenic, scientific, educational, conservation, cultural, religious and historical use only insofar as these uses are consistent with the spirit and provisions of this Ordinance. Human use of the Area must not interfere with the preservation of the Area as Wilderness. [Ordinance 79A]</p>	
Finland	<p>1) Preserve wild areas, 2) Safeguard Lapp culture and indigenous livelihoods, 3) Develop the potential for diversified use of nature.</p>	
Iceland	<p>The purpose of this Act is to direct the interaction of man with his environment so that it harms neither the biosphere nor the geosphere, nor pollutes the air, sea, or water. The Act is intended to ensure, to the extent possible, that Icelandic nature can develop according to its own laws and ensure conservation of its exceptional or historical aspects. The Act shall facilitate the nation’s access to and knowledge of Icelandic nature and cultural heritage and encourage the conservation and utilization of resources based on sustainable development. [Article 1]</p>	

Matrix B: Legislative Purpose		Page 3
Country	Goal(s) of Wilderness Legislation	
Japan	Not identified	
New Zealand	Wilderness areas are wild lands designated for their protection and managed to perpetuate their natural condition and which appear to have been affected only by the forces of nature, with any imprint of human interference substantially unnoticeable ... Wilderness designation preserves resources and thus options for future use of the land.	
Russia	The following goals are assigned to strict state nature preserves (zapovedniks): a) realization of the protection of natural areas with the dual goals of preservation of biological diversity, and the maintenance of protected natural complexes and objects in a natural condition; b) organization and performance of scientific research including maintenance of Letopis Prirody (Chronicles of Nature); c) realization of ecological monitoring within the framework of the general state system of the natural environment monitoring; d) environmental education; e) participation in State Ecological Expertiza (environmental impact assessment) of projects and schemes, i.e. schemes of placement of economic (industrial) and other types of objects; f) assistance in training the scientific community and specialists in the sphere of protection of the natural environment." [Article 7]	
South Africa	... designated ... for the purpose of retaining an intrinsically wild appearance and character or capable of being restored to such and which is undeveloped and roadless, without permanent improvements or human habitation. [Sec. 1(1)].	
Sri Lanka	For the purpose of preserving in their natural state, unique eco-systems, genetic resources; or physical and biological formations and precisely delineated areas which constitute the habitat of threatened species of animals and plants of outstanding universal values from the point of view of science or conservation; for enhancing the natural beauty of the wilderness of Sri Lanka and for promoting the scientific study and enjoyment thereof by the public. [Sec. 2(1)]	

<p>Matrix B: Legislative Purpose</p>	
<p>Page 4</p>	
<p>Country</p>	<p>Goal(s) of Wilderness Legislation</p>
<p>United States</p>	<p>In order to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness. For this purpose there is hereby established a National Wilderness Preservation System to be composed of federally owned areas designated by Congress as "wilderness areas," and these shall be administered for the use and enjoyment of the American people in such manner as will leave them unimpaired for future use as wilderness, and so as to provide for the protection of these areas, the preservation of their wilderness character, and for the gathering and dissemination of information regarding their use and enjoyment as wilderness. [Section 2(a)]</p>

Matrix C: Allowed Uses of Wilderness									
Legislated Public Uses (Yes = allowed/permitted; No = not allowed/prohibited/restricted)									
Country	Scientific	Subsistence or Traditional	Commercial	Extractive Activities	Motorized	Preexisting Rights	Roads, Buildings, Structures	Other Uses	
Australia	Yes [Section 10(5)]	Not identified	Not identified	No [Section 10(5)]	No [Section 10(5)]	Not identified	No [Section 10(5)]	No timber felled, excavation [Section 10(5)]	Page 1
Australia— State of New South Wales	Yes [Section 5(e)]	Not identified	Not identified	No—Section 2(1) prohibits development, which includes vegetation clearing. However, mining or other extractive activities might be allowed if a preexisting “interest” under Section 8(5).	Not identified	Yes—Protects any preexisting “interests” including any authority, authorization, permit, lease, license, or occupancy, whether or not arising under the act. [Section 8(5)]	No—Section 2(1) prohibits “development,” which includes: building, work, subdivision, clearing of vegetation, unless by the approval of the Minister if the Minister is of the opinion the development will have no adverse effects.	Not identified	
Australia— State of South Australia	Yes [Section 12(k)]	Yes [Section 12(n,o)]	Yes [Section 8(4)]	Not in wilderness protection areas, but permitted in wilderness protection zones, by proclamation of	Yes [Section 41(2)(q)]	Yes (mining, subsistence) [Sec. 25(3)-(5)].	No [Section 26(1)(b)]	Grazing of stock and all other forms of primary production are	

Matrix C: Allowed Uses of Wilderness									
Legislated Public Uses (Yes = allowed/permitted; No = not allowed/prohibited/restricted)									
Country	Scientific	Subsistence or Traditional	Commercial	Extractive Activities	Motorized	Preexisting Rights	Roads, Buildings, Structures	Other Uses	
Australia— State of South Australia <i>continued</i>				the Governor Section 25(3), and subject to restrictions in Section 25(5)—the proclamation must be simultaneous to the wilderness declaration, and to enable exercise of preexisting mining rights.				prohibited. [Section 26(1)(a)]	
Canada	Not identified	Yes [Section 17 by reference to [Section 14(3)(d)]	Not identified	Traditional resource harvesting in specified parks [Section 17].	Yes [Section 14(3)]	Yes	Basic user facilities including trails, rudimentary camp-sites may be permitted. [Section 14 (3)(c)]	Air access permitted to remote parts of wilderness areas [Section 14(3)(e)].	
Canada— Province of Ontario	Yes [Section 2(4)]	Yes [Section 4] reaffirms existing aboriginal	Yes [Section 14]	No commercial timber harvest, generation of electricity, mining activity, extracting aggregate, topsoil	Yes—to address certain needs, such as	Yes—exceptions made for preexisting oil and gas wells, aggregate pits,	Yes—Subject to approval, roads to mining claims or to access minerals or timber outside a Provincial Park allowed.	No Hunting not allowed, unless permitted by regulation	

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Country	Scientific	Subsistence or Traditional	Commercial	Extractive Activities	Motorized	Preexisting Rights	Roads, Buildings, Structures	Other Uses	Page 3
Canada- Province of Ontario <i>continued</i>		and treaty rights of the aboriginal peoples of Canada under Constitution Act 1982.		or peat, or other industrial uses. [Section 16]. Building a facility for electricity generation for Provincial Park purposes also allowed if no reasonable alternative. (Also see Preexisting column.)	non-conforming pre-existing uses, for use by First Nations, to access in-holdings, for permitted air access to remote parts of the park. [Section 54(3)]	electricity generation, and timber operations in Algonquin Provincial Park. Electricity generation allowed only if no reasonable alternatives or for communities not connected to the main electrical grid.	Utility corridors for electrical transmission also allowed. Roads must be closed if not used for 5 years.	under the Fish and Wildlife Conservation Act of 1997 and in certain townships incorporated into Algonquin Provincial Park [Section 15(1)(2)]	
Canada- Province of Newfoundland and Labrador	Yes [Section 20]	Yes [Section 3.1]	Not identified	No. No cutting or logging of trees, agriculture, mining, prospecting, or claims staking. [Section 24]	No [Section 24]	Yes [Section 25], but activities must not be increased.	No [Section 24], includes prohibition on landing aircraft.	No altering water flows into or within a wilderness reserve [Section 24]; no spraying	

Matrix C: Allowed Uses of Wilderness

Legislated Public Uses (Yes = allowed/permitted; No = not allowed/prohibited/restricted)									
Country	Scientific	Subsistence or Traditional	Commercial	Extractive Activities	Motorized	Preexisting Rights	Roads, Buildings, Structures	Other Uses	
Canada Province of Newfoundland and Labrador <i>continued</i>								against insect infestations without approval by the Minister [Section 24]. Note: General exemption from prohibited activities in Section 24 if deemed necessary for management of the reserve.	
Confederated Salish and Kootenai Tribes	Yes [Section 5(e)]	Yes [Section 1]	No [Section 5(d)]	Not identified	No [Section 4(d)]	Yes, for livestock grazing [Section 5(a)]	No [Section 4(d)]	Non-tribal members are subject to management restrictions for entry, group	

Matrix C: Allowed Uses of Wilderness									
Page 5									
Legislated Public Uses (Yes = allowed/permitted; No = not allowed/prohibited/restricted)									
Country	Scientific	Subsistence or Traditional	Commercial	Extractive Activities	Motorized	Preexisting Rights	Roads, Buildings, Structures	Other Uses	
Confederated Salish <i>continued</i>								size, length of stay, use of firearms [wilderness.net]	
Finland	Not identified	Yes [Section 4]	Not identified	Restricted logging [Section 7], but has only been permitted in one area to date. No mining unless permitted for a compelling social purpose [Section 4]	No [Section 5]	Yes [Section 12]	No, unless permitted for a compelling social purpose [Section 6]	Not identified	
Iceland	Not identified	Yes [Article 12]	Not identified	Not identified	No [Section 3(4)]	Not identified	No [Section 3(4)]	Not identified	
Japan	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Not identified	Activities negatively impacting the ecosystem are strictly prohibited.	

Matrix C: Allowed Uses of Wilderness

Legislated Public Uses (Yes = allowed/permitted; No = not allowed/prohibited/restricted)

Country	Scientific	Subsistence or Traditional	Commercial	Extractive Activities	Motorized	Preexisting Rights	Roads, Buildings, Structures	Other Uses
New Zealand	Not identified	Not identified	No, unless permitted.	No	No	Not identified	No	Horses may be allowed where strong historical links exist, and where legislation permits.
Russia	Yes	Not identified	Not identified	Yes [Article 6(2)]	Not identified	Not identified	Not identified	Not identified
Sri Lanka	Yes, if permitted [Section 3(2)]	No	No selling of forest products, wildlife [Section 4]. Ecotourism or non-extractive activities are not identified.	No	Not identified, presumably no.	Not identified	No [Section 4]	No cultivation [Section 4]

Matrix C: Allowed Uses of Wilderness										
Legislated Public Uses (Yes = allowed/permitted; No = not allowed/prohibited/restricted)										
Country	Scientific	Subsistence or Traditional	Commercial	Extractive Activities	Motorized	Preexisting Rights	Roads, Buildings, Structures	Other Uses		Page 7
South Africa	Not identified	Not identified	Not identified	No [Section 22(2)(c) and Section 26(2)(c)]	No [Section 22(2)(c) and Section 26(2)(c)]	Not identified	Not identified	Not identified		
United States	Yes, if permitted [Section 4(b)]	No, unless allowed by legislation (e.g. Alaska)	No, unless permitted [Section 4(d)(6)]	No, unless permitted [Section 4(d)(3)]	No [Section 4(c)]	No, except aircraft or motorboats [Section 4(d)] and livestock grazing [Section 4(d)4]	No [Section 4(c)]	Not identified	Not identified	

Matrix D: Administration and Management

Legislated Administration and Management of Wilderness						
Country	Management Goal(s)	Buffer Zones Outside Wilderness	Use of "Minimum Necessary Management Tool" Concept	Treatment of In-holdings	Reporting and Accountability	
Australia	Not identified	Not identified	Not identified	Not identified	Annual Report on operations by Director of National Parks and Wildlife (Section 52)	
Australia— State of New South Wales	<ul style="list-style-type: none"> a. to restore (if applicable) and to protect the unmodified state of the area and its plant and animal communities, b. to preserve the capacity of the area to evolve in the absence of significant human interference, c. to permit opportunities for solitude and appropriate self-reliant recreation. 	Not identified	Not identified	Not identified	Not identified	
Australia— State of South Australia	The wilderness code of management will address: <ul style="list-style-type: none"> a. preservation of wildlife and ecosystems; b. restoration of land and its ecosystems to their condition before European colonization and the 	Yes [Section 22(5)]	Not identified	Not identified	Yes—Annual Report by the Minister containing the names and locations of wilderness protection areas and zones, and the extent to which wilderness criteria are met	

Matrix D: Administration and Management					
Legislated Administration and Management of Wilderness					Page 2
Country	Management Goal(s)	Buffer Zones Outside Wilderness	Use of "Minimum Necessary Management Tool" Concept	Treatment of In-holdings	Reporting and Accountability
<p>Australia— State of South Australia <i>continued</i></p>	<p>protection of land and its ecosystems from the effects of modern technology and exotic animals and plants and other exotic organisms; c. preservation of Aboriginal sites and Aboriginal objects; d. preservation of historic sites and objects and structures of historic or scientific interest; e. preservation of features of geographical, natural or scenic interest; f. destruction of dangerous weeds and the eradication or control of noxious weeds and exotic plants; g. control of vermin and exotic animals and other exotic organisms; h. control and eradication of disease of animals and vegetation; i. prevention and suppression of</p>				<p>by each; identification of former reserves or parts of reserves that are now wilderness protection areas or zones; extent of mining operations; restoration activities; list of management plans; portions of wilderness protection areas or zones that the Minister has declared as prohibited areas and reasons for the declaration; an account of money received and expended on management; an account of royalties.</p>

Matrix D: Administration and Management					
Legislated Administration and Management of Wilderness					
Country	Management Goal(s)	Buffer Zones Outside Wilderness	Use of "Minimum Necessary Management Tool" Concept	Treatment of In-holdings	Reporting and Accountability
<p>Australia— State of South Australia <i>continued</i></p>	<p>bush fires and other hazards; j. conduct of firefighting and other emergency operations; k. conduct of scientific research l. education of the public as to the significance of wilderness protection areas and zones; m. use of wilderness protection areas and zones by members of the public; n. hunting in wilderness protection areas by Aboriginal people; o. the entry in and use of wilderness protection areas and zones by Aboriginal people to observe Aboriginal tradition. [Section12(2)]</p>				
	<p>"Not authorize any activity to be carried on in a wilderness area that is likely to impair the wilderness character of the area." [Section 14(2)]</p>				

Matrix D: Administration and Management					
Legislated Administration and Management of Wilderness					
Country	Management Goal(s)	Buffer Zones Outside Wilderness	Use of "Minimum Necessary Management Tool" Concept	Treatment of In-holdings	Reporting and Accountability
Canada— Province of Ontario	Not identified, but see definition and legislated purposes above.	Not identified	Not identified	No, [Section 13] though the minister may extend an existing lease or may grant new leases for private noncommercial purposes if the lease is consistent with the Act and its regulations.	Yes—Report required every 5 years on state of the parks. Report includes degree of ecological representation, ecological and socioeconomic benefits, number and area of parks, and threats to ecological integrity. [Section 11(1-4)] Also: Annual report on finances [Section 27(4)].
Canada— Province of Newfound- land and Labrador	The minister may carry out measures or programs in a reserve, a. for the preservation and protection of the reserve; b. for biological or physical research; or c. for anything necessary for the purpose of this act.	Not identified	Not identified	Yes [Section 23]	Yes—Advisory Council to report to the minister on the expenses and operations of the Advisory Council [Section 15].

Matrix D: Administration and Management							Page 6
Legislated Administration and Management of Wilderness							
Country	Management Goal(s)	Buffer Zones Outside Wilderness	Use of "Minimum Necessary Management Tool" Concept	Treatment of In-holdings	Reporting and Accountability		
Sri Lanka	Not identified	Not identified	Not identified	Private property within the wilderness is deemed to be required for a public purpose and may be acquired [Section 2(4)].	Not identified		
South Africa	Not identified	Not identified	Yes	Not identified	Not identified		
United States	1) Preserve wilderness character. 2) Administer the area for the other purposes for which was established while preserving its wilderness character [Section 4(b)].	Not explicitly identified in Wilderness Act, but in at least 22 wilderness laws, buffers are not allowed.	"...except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act" [Section 4(c)].	"Adequate access" is assured to state or private land within wilderness [Section 5(a)].	Annual report required on status of the wilderness system [Section 7].		