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AMLR NRM Board
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Sent via email:

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14 March 2011

**Re: Annual Review of the AMLR NRM Board
Investment Plan (Vol C) 2011/12-2013/14**

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Dear Kym,

As a Peak Body under the *Natural Resources Management Act 2004*, the Conservation Council of South Australia (Conservation SA) welcomes the opportunity to make comment on the proposed amendments to the draft Investment Plan for the Adelaide and Mount Lofty Ranges Natural Resources Management Board.

Conservation SA has made direct comment on the proposed changes to the Investment Plan as well as some general comments on planning, partnerships and the support programs areas of knowledge and information and monitoring and evaluation.

The Board is to be commended on both its Draft Investment Plan 2011/12 to 2013/14 and the 2009/10 Achievements report. A key challenge for NRM Boards is communicating the Board's statutory obligations, what they have been achieving and what they intend to achieve over the next year. The Board has clearly articulated this throughout these documents.

General Comments

Planning

The Board is to be congratulated on how it has established a strategic plan, set short term targets (MATs) and monitored the delivery of the MATs.

Conservation has a few queries with the overall planning approach.

- The NRM Act requires a 10 year strategic plan and yet the Board has 20 year resource condition targets. How does the Board intend to monitor the effectiveness of the 10 year planning horizon?
- Given that the NRM Plan (B) is for the region and the Investment Plan, specifically, is for the Board there are short term targets for the Board but no short term targets for all stakeholders to deliver the Regional NRM Plan.
- How does the Board account for the collective action of all other stakeholders on natural resource issues?
- Did the Board consider whether to have a range of lengths for the MATS which would reflect task rather than what appears to be an administration approach?

Partnerships

As acknowledged in the Investment Plan, '[p]artnerships and collaboration are vital to the successful implementation of both the Board's Investment Plan and the plans of our partners' (pg. 4). Conservation SA commends the Board for its commitment to a collaborative partnership approach to NRM in the region. However, it is not clear in this Investment Plan, what the Board's intended process for engaging partners is, in particular what the criteria will be (nor the process for determining projects to be run internally by Board staff and those to be run externally). It is, however, noted (table 9, pg 21) that there is the intent to consult and engage with ... stakeholders' with commitment to 'improved engagement with our partners in planning and program delivery'.

Notwithstanding Conservation SA would like to see a transparent, efficient, timely, equitable and above all consistent process for supporting and engaging potential delivery partners. The recently signed MOU between NRM Boards and nine state-based NGO's highlights the value that NGOs offer in NRM planning, program development and project delivery. In terms of delivery the custodians of the MOU have agreed to commit:

"To optimise the effectiveness and efficiency of project delivery, NRM Boards and e-NGOs commit to developing and implementing the following where appropriate:

- Open and clear process for parties to register and then demonstrate interest in project delivery
- Transparent criteria for assessing delivery options
- A register of delivery agents identifying skills and project management experience
- Standard contracts and agreements wherever possible" ('The Mutual Agreement: An Agreement between the South Australian Non-Government Environmental organisations and Natural Resources Management Boards to improve natural resources management outcomes for the South Australian community' 2010)

Further the intended manner of engaging potential delivery partners may become apparent through the Annual Implementation Plan process but it would be useful to include some information in Volume C about the Boards intentions in this area. Conservation SA is happy to facilitate further discussion about such partnership issues.

Support Programs: Knowledge and Information

Conservation SA commends the Board for investing in the area of Knowledge and Information'(pg 22) to ensure '...improved understanding of our environment and developing better resource management technologies...as we face compounding challenges of climate change, population growth and sustained resource use'. It would have been worthwhile in the foreword to this document making mention of such challenges and how the Board intended to respond thereby demonstrating clear leadership to all natural resource managers in the region. Acknowledged there will be an opportunity to further explore such intent during consultation processes for the five-year review of the NRM Plan later this year. Also Conservation SA notes there was strong support in feedback received during consultations on the Concept Statement review (2010) about the importance of strengthening the focus on climate change.

Given the Board is already investing in the area of Knowledge and Information, it would have been useful to make (specific) mention of how improved understanding has led to changes in the Boards programs thereby demonstrating adaptive management.

Also in the list of the Board's support programs should 'Knowledge and Information' be listed rather than 'research and development'? (pg 15)

Monitoring, Evaluation and Reporting

As Monitoring, Evaluation and Reporting activities are fundamental to achieving more effective NRM outcomes presumably there is a mechanism that can update the NRM regions vulnerability to climate impacts through the latest science accessed through the Knowledge and Information program?

Comments on Proposed Amendments

Budget Breakdown by Program: Adelaide's living beaches

With the inclusion of the Adelaide living beaches strategy as a proposed program area and a budget of \$2.3 million for 2011/12 (8 % of the Boards budget) it would be useful to make mention of the process utilised to make savings across all Program areas to accommodate this. It is also noted that by adopting the Adelaide Living Beaches Strategy an increase in the levy is on the cards for 2013/14.

Proposed Funding Sources/Budgets

There have been carryovers between \$0.9m to \$1.2 in past but according to the next three years there will be no carryover. Presumably there is an assumption that carryovers will be equal each year (i.e. net result zero) but it is worthwhile indicating the carryovers.

Re NRM water levy (public water supply) (table 16 footnote 2) it is noted that \$1.2m will be collected next year and it only affects SA Water. A comment re this would be useful in the Social Impact of Levy section in the appendix as SA Water will inevitably pass this on to the public

Five year intermediate targets (2011-2016)

Conservation SA acknowledges that these new intermediate targets are operational targets that represent what the Board contributes towards the 20 year regional targets however more definition would be useful to see where these targets fit with what is being achieved by all stakeholders.

- Target i1: Would be useful to see more definition i.e. from x to y rather than statements like 70% of engaged landholders ...
- Target i3: re investment in additional 2GL of stormwater etc it would be more useful to say increase stormwater harvesting from X to Y thus clarifying how the intermediate targets build on the old MATs.
- Target i4: again useful to see how new MATs build on old ones. For example an old MAT was stormwater Management for 20 % of urban area and the new one is now 40%. As the old MAT is on target but will disappear from planning documents it may be more useful to say an increase from 20 % to 40%.
- Target i8: Would be useful to see more definition i.e. from x to y rather than statements like 10% increase in community engagement.
- Target i9: What does action taken to support recovery of 20% of threatened and/or declining species mean?
- Target i11: Again would be useful to link this to the old MATS – It is also not clear what 1500 HA of native ecosystems constructed means.

- A query as to why the intermediate MATS do not cover all areas of the Boards responsibilities e.g. There are neither regulatory MATS nor MATS about feral pests.
- With the adoption of the State Government's Adelaide's Living Beaches Strategy should there also be an accompanying MAT?

Staff Changes

On first reading the reduction in (on-ground) project officers ((i.e. people employed outside Board) with an increase in Board staff could be seen as a concerning trend and is worthy of further explanation.

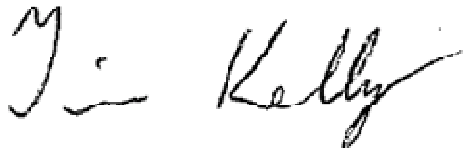
Levies

Conservation SA is supportive of the Board's proposed increase in the levy in 2011/12 and 2012/13 as part of the equalisation process. It is vital to secure sufficient funds across the region in order to ensure adequate investment in managing the regions natural resources.

Finally, with the establishment of the Department of Environment and Natural Resources (DENR) and the integration of most of the NRM activities within a single government department it is acknowledged that this provides the AMLR NRM Board with further opportunities to work in partnership with a range of stakeholders. How this eventuates will become clearer over time.

Conservation SA appreciates the opportunity to respond to the Annual Review of the AMLR NRM Board Investment Plan and trusts these comments will be duly considered.

Yours sincerely,

A handwritten signature in black ink that reads "Tim Kelly". The signature is written in a cursive, flowing style.

Tim Kelly

CE

Conservation Council of South Australia