

State NRM Plan
c/o NRM Council
GPO Box 1047
Adelaide
SA 5001

Sent by email:
StateNRMPlan@sa.gov.au

19 December 2011

Dear Sir

Re: Draft State NRM Plan

I am writing to you concerning the draft State Natural Resources Management (NRM) Plan for South Australia.

Thank you for the opportunity to comment on the draft Plan. As the peak conservation body for South Australia, the Conservation Council of South Australia (CCSA) recognizes the importance of good planning in determining the future of our community and the particular importance of the NRM Plans – at state and regional levels.

CCSA is an independent, non-profit and strictly non-party political organization representing over 50 of South Australia's environment and conservation organizations and their 60,000 supporters.

CCSA developed, in 2009, a comprehensive view of environment policy in "South Australia in a Changing Climate: A Blueprint for a Sustainable Future" (<http://www.conservation.sa.gov.au/blueprint.html>) This document sets out, at a strategic level, policy positions in six key environmental areas: planning and development, water, waste, energy, biodiversity and coast and marine. Many of those policy positions are relevant to the following comments on the draft State NRM Plan.

At the outset, CCSA commends the NRM Council on the style and quality of the document. The document is strategic in nature and should provide a clear guide for the regional NRM plans that will subsequently be developed. The use of indicators throughout the document was particularly helpful in conveying a large quantity of data about NRM issues and conditions.

CCSA wishes to offer a number of suggestions for improvement of the document. These suggestions are based on extensive feedback received from its member groups and take the form of eleven overarching proposals, plus more detailed



**Conservation
Council SA**

Address : The Conservation Centre
Level 1, 157 Franklin Street
Adelaide SA 5000

Phone : (08) 8223 5155
Fax : (08) 8232 4782

Email : general@conservation.sa.gov.au
Web : www.conservation.sa.gov.au

ABN : 22 020 026 644

comments in an attachment to this letter. The suggestions include the following proposals:

Proposal 1: the plan needs to spell out what is to be achieved and who is responsible for driving for those outcomes.

The document does not capture strongly the concept of targets and accountability. Whilst they are mentioned throughout, the greatest area of weakness of the draft Plan is that it does not articulate what will have been achieved by the time that it expires and which party, in a real and practical sense, is primarily responsible for achieving those targets and funding the actions which lead to them. CCSA applauds the direction of the document to ensure greater collaboration and partnerships. However, this is not the same as defining specific responsibilities. The Plan would benefit greatly from spelling out specific targets, and responsibilities – perhaps in a separate section of the Plan.

Proposal 2: there is a need for a call to action.

While the draft Plan is a competent document, it substantially underplays the challenges ahead for a South Australia genuinely trying to ensure a sustainable future. CCSA believes that the draft Plan would be substantially improved with specific attention given to spelling out the key priorities on which SA needs to make progress during the life of the Plan. Articulating these priorities will provide a sense of colour and urgency to the Plan, and link the indicators in Appendix 1 of the Plan to the actions that flow from them. Doing this would also provide a coordinated focus for galvanizing action across all the relevant agencies – local, state, federal, and non-government – and clearly make this a Plan for the State as a whole. Examples of four key priorities that could form part of the proposed **call to action**:

- Through the (current) draft Murray-Darling Basin Plan process South Australia needs to secure enough of the Murray-Darling Basin's water to improve basin health and create resilience in all parts of the river system in South Australia. This includes sufficient flow to:
 - maintain good water quality in Lake Alexandrina and Lake Albert
 - to underpin the health of the Coorong; and,
 - to flush out the (average) two million tonnes of salt that the River Murray carries each year from the Basin's catchments through the Murray Mouth.

Without this, South Australia will be the dumping ground for the Basin's salinity (2/3 of which comes from the upstream states). It will also mean that achieving Target number 5 of improving or maintaining water quality will be impossible in the period of this Plan.

- Getting marine parks with comprehensive adequate and representative sanctuary areas established and operational is crucial to making progress on Targets numbered 8, 9 and 10 in the period of this Plan.
- Acknowledging the issue of food security in adapting to climate change (Target number 3). This issue has been highlighted in many international forums throughout 2011 and will be very topical throughout the period of currency of this Plan. Most recently, at CHOGM, for example, the Prime Minister announced funding for a national Food Security Centre and the

Australian Government is developing a National Food Plan. Tackling food security at the local level (e.g. through growing food locally) is also one very direct way in which the community can actively participate in climate change adaptation.

- Achieving improvements in condition, continuity and connectedness of habitats for biodiversity is crucial to prevent further species loss and restore stability and improvements to vulnerable populations. The plans for five NatureLinks corridors outline priority areas and regions for focus but achieving the improvements required at a landscape scale requires government and community collaboration and adequate resourcing (refer Targets 7, 12 and 13).

Proposal 3: the plan needs to incorporate or refer to a funding and investment strategy.

The best-laid NRM plan in the world cannot achieve the outcomes sought at a landscape scale without a strong commitment to funding and resources that are accessible to communities and delivery partners to implement the plan. Whilst there are always budget constraints, funding by government for the environment sector appears to be shrinking in real terms at a time when the need to restore and protect species and ecosystems is becoming more urgent. If building resilience in the State's natural systems is important particularly in recognition of growing climate change impacts, then this plan must be adequately resourced and funded by government. In this context, CCSA notes that South Australia did poorly in the recent *Caring For Our Country* funding round – thus highlighting the need for a strategic and reliable source of funding for natural resource management projects.

Proposal 4: the Plan needs to provide “anchorage” for other partners’ investments.

The NRM Management System, described on pages 16 to 19 of the draft Plan, outlines the roles of the various partners involved in NRM activities. The Plan also highlights, on page 20, a number of priority actions to strengthen the Management System. Most of these actions appear to be the responsibility of the NRM Council or Regional NRM Boards. There is little guidance given to any of the other partners – for example, local government, the federal government or NGOs such as Trees For Life, Conservation Volunteers or Greening Australia – as to priority actions or investments that they could make to assist in implementing the Plan. CCSA believes that much can be done by the broader community if the State NRM Plan fully engages with NGOs during the planning process – at both the strategic level and during action planning processes. Each of the NGOs has particular strengths and resources – these should be identified and leveraged throughout the planning process and in the Plan itself.

Proposal 5: The Plan would be more robust if it embraced the notion of ecosystem services.

Goal 2 on page 8, for example, refers to soil and water as the key natural resources whose condition is being monitored. CCSA believes that natural resources management needs to include a wider definition of ecosystem services than just soil

and water. These ecosystem services will require the development of condition measures and monitoring and should include¹:

- provisioning services such as food, raw materials, fresh water and medicinal resources;
- regulating services such as local climate, carbon sequestration, extreme event regulation, waste water treatment, soil erosion and fertility, pollination and biological control
- habitat or supporting services such as habitats for species and genetic diversity
- cultural services such as recreation, tourism, aesthetic appreciation and spiritual experience.

Proposal 6: the Plan would be improved with a greater emphasis on *innovation*.

While the discussion in the document articulates useful strategies, the Plan would be materially enhanced if there were specific strategies to encourage innovative approaches to natural resource management. As one small example, the creation of an education/demonstration centre aimed at urban communities to extend their understanding and appreciation of natural resource management would be of value. The Centre for Education and Research in Environmental Strategies (CERES) in Melbourne offers a model of such a centre. (refer <http://www.ceres.org.au>)

Proposal 7: the Plan could be improved with a stronger focus on what is envisaged by *community* and how the community ideally interacts with the Plan.

There are numerous references throughout the Plan to community involvement and ownership. However, the member groups and individuals whom CCSA consulted on the draft Plan repeatedly raised concerns about the way in which NRM Boards interacted with the community even within the same Board and region, citing uneven forms of engagement, discontinuities in program and funding cycles, support needed for successful community actions and unrealistic expectations about the extent to which community members can provide their own resources to address natural resource management problems. This could be addressed, for example, by describing in the Plan a model form of engagement for use in NRM regions that facilitates active community partnerships. CCSA recommends that the next step in the process of development of this NRM Plan should further the conversations with the community. This would be particularly relevant at the Action Plan stage.

Proposal 8: the Plan would benefit from discussion on *learnings* from the previous Plan.

While the indicators in this draft give a sense of movement and progress (or decline), the Plan would be much stronger if the review and analysis of the previous Plan were clearly incorporated – specifically the achievements/outcomes, the roles of the parties involved, what worked well and where improvements need to be made. These learnings are important to explain the rationale for changed and new strategies. CCSA believes that the second State NRM Plan should draw upon learnings about the effectiveness of the linkages between the first State NRM Plan

¹ *A quick guide to the Economics of Ecosystems and Biodiversity for Local and Regional Policy Makers*

and the Regional Plans that were subsequently developed – in particular, the consistency of terminology and approach. Without these in place, it is difficult to compare regional actions and outputs, and to sum them at the State level. The indicators used at the State level (such as in this second State Plan) also need to have linkages with those used at the regional level. This does not currently appear to be the case.

Proposal 9: the Plan should acknowledge the role of mining over the period of the Plan.

In South Australia, mining tenure operates in parallel with normal land tenure over the same parcels of land. Given the likely future scale of mining in South Australia, it would be appropriate to highlight the issues raised by mining activities and to ensure that mining-related organisations are aware of the part they play in the management of the State's natural resources. CCSA has particular concerns over groundwater management, permanent changes in geological features, soil degradation and impact on vegetation communities – all of which fall within the purview of *the Natural Resource Management Act 2004*.

Proposal 10: the Plan needs to have a solid scientific foundation.

The first NRM Plan included a set of ecological principles. These appear to have been replaced, in part, by a set of general standards (see page 21, for example). While the standards are useful as a guide to making better decisions, CCSA believes that the Plan would be stronger and more robust if it specifically acknowledged a basis of ecological principles such as those outlined in current NatureLinks documentation in the NRM Standard (page 21). CCSA is very interested in contributing to the development of the NRM Standard to ensure that ecological principles are at the centre of NRM decision-making.

Proposal 11: the Plan would benefit from greater clarity on the statutory responsibilities inherent in the NRM system – particularly those of the Regional Boards.

The draft Plan largely ignores the statutory responsibilities of Regional NRM Boards. It should provide guidance on how those statutory responsibilities can assist in the delivery of the Plan, how the Council monitors the effectiveness of their delivery and how the delivery can be more appropriately funded given the reducing resources of many Boards.

I would be happy to meet with the Council to discuss these proposals further.

Yours sincerely,



Tim Kelly
Chief Executive

Cc Minister for Environment and Conservation

Chief Executive, Department of Environment and Natural Resources

Attachment: Additional detailed comments

Page 2: Suggest that a definition of *adaptive management* would be useful.

Page 4: Useful to include the Crown Lands Management Act 2009 as it is the underpinning land legislation for the State and it has a more environmental flavour than its predecessors.

Page 4: Useful to set out a context for this Plan – while the Acts on page 4 provide some of the context, there is quite a bit more happening at state, national and international levels.

Page 5: Would be useful to have mechanisms that evaluate the outcome and achievements of the Plans.

Page 6: Who sets the limits under Goal 2? How do they link to the Targets?

Page 6: Useful to include in one of the Goals a reference to the intrinsic value of species and ecosystems – not just their utility for humans?

Page 8 and 11: A useful indicator under Goal 1 would be a measure of government investment in conservation activities, as a measure of it taking responsibility - thus also providing leadership to the community to do likewise. This applies to Goal 1 targets on page 11 also.

Page 8: Should Goal 3 contain an indicator about climate change adaptation?

Page 9: Would be appropriate to acknowledge the pressures/tensions/conflicts that genuinely exist between pursuit of natural resource management outcomes and various government policies (e.g. government is also pursuing growth policies in mining, aquaculture and population). Where will these tensions be dealt with in the NRM Plan?

Page 9: Two additional pressures are *unsustainable planning decisions*, and *projected population increases*.

Page 10: Under Goal 1, one element of community capacity is worth treating separately: the level of community understanding of the science behind natural resource management. CCSA believes that good communication and understanding around the science often falls far short of (often) well-funded disinformation campaigns on topics relevant to natural resource management. In addition, governments are often unwilling to publicly acknowledge that the natural resources of the environment are the essential elements underpinning the society and economy – not a negotiable “nice to have”. A broad level of understanding of the science by the community is thus fundamental to government being able to make appropriate natural resource management investments in the knowledge that the community will back them.

Page 11: Are Targets given to particular bodies to take a lead e.g. Target 10 to the Marine Parks Council?

Page 11: Goal 2 – would it be useful to include a target to *protect arable land from development*?

Pages 12-13: Appropriate to include Environmental NGOs under several of the Targets

Pages 12-15: Useful to include targets applicable to ecosystem services here (see Proposal 4 above).

Page 13: Useful to include the Pastoral Board under Target number 4?

Pages 13-14: Useful to include the Marine Parks Council under targets numbered 8, 9 and 10?

Page 14: The measures for Targets 9 and 10 should more closely reflect current science and policies in progress (i.e. marine parks). In Target 9 the first measures referring to marine ecosystems (rocky reefs and seagrass) would more appropriately fit under Target 10. It is appropriate to leave the others in the Target 9 under 'coastal ecosystems'. However, there are at present no good indicators of the condition of any of these ecosystems, so this measure is almost impossible to use unless supported by significant research to develop the condition measures. CCSA manages the Reef Watch program that provides an annual reef health report for the AMLR NRM Board, including the use of health indices. However, the Reef Watch steering committee, comprising a number of experienced marine scientists, consistently advises against the use of these indices because of their indicative nature.

Page 14: Another potential measure for Target 9 is the trend in the extent of coastal land being managed for conservation purposes (e.g. in marine parks, conservation parks or privately through Heritage Agreements).

Page 14: Add in 'extent and condition of rocky reefs and seagrass meadows' or research to develop condition measures for these ecosystems under Target 10. The use of the measure for 'trends in the extent of marine parks and sanctuary zones' is of² limited value, as the outer boundaries for marine parks in SA have already been declared and are unlikely to change during the lifetime of this NRM plan. The zoning also is likely to be in place during the life of the plan and unlikely to change, therefore there will not be a 'trend'. A more appropriate measure would be along the lines of 'declaration of marine park sanctuary zones'. The second dot point also needs a qualifier to be meaningful. It states a 'trend in a representative selection of species and habitats' but representative for what? Protection? Formal listing? Represented where, how? Again, there is unlikely to be a 'trend' to measure given the paucity of knowledge about marine species and ecosystems (making it very difficult to nominate marine ecosystems for EPBC listing), lack of legislative structures at the state level for marine species protection, and the state government review of natural resources legislation. In the 'responsible (assisted by) column, PIRSA needs to be added as an assisting agency with respect to the third measure.

Page 15: Target 14 - Concern also that government-owned land can slip off the radar – needs to be a target for government maintaining its own reserves, given their enormous size.

Page 15: Target 14 – Should this target also refer to discouragement of chemical (artificial) pesticides and herbicides, where practical?

Page 16: Aboriginal people are mentioned briefly as a part of the Management System and again in Priority Actions 2 and 7 on page 20. Are there particular plans to beef up aboriginal involvement in NRM beyond existing mechanisms such as Aboriginal Advisory Committees - in particular, to ensure direct aboriginal involvement in NRM decision-making and in land management projects given several successful pilots of such projects over the last few years by a variety of agencies.

Pages 16 -21: Useful to have an organisational chart and descriptive text showing how the NRM Council, regional Boards, relevant committees, government agencies (local, state and federal), local groups and key NGOs interact in delivering the NRM targets. This should lead to more specific descriptions of how the *NRM Standard* could be implemented. At a more detailed level of planning (either in the Plan or subsequently), it would be useful to spell out which groups are working to deliver each NRM outcome and the relevant support programs available. Also useful to show how the relevant parts of DENR link in with the NRM bodies. Note also that some organisations have state-wide statutory and management responsibilities, while others have local responsibilities only.

Page 20: Concern that the Priority Actions lack the inspiration for NRM managers to strive towards achievement e.g. the Plan describes the condition of threatened species and threatened ecological communities as poor and declining. One would expect that the Priority Actions therefore to be more clearly linked with changing the NRM management system to achieve a real turnaround in these conditions and trends.

Page 20: Was it intended that an Action Plan for NRM Council would also be included, in addition to the list of Priority Actions?

Page 20: Actions 3 and 10 could also include work on broader understanding by the community on the science behind natural resource management (refer to comments above concerning page 10)

Page 20: Are measures for success of the priority actions contemplated?

Page 20: Action 4: Would prefer to see this emphasise a more specific goal such as *creating and implementing clear joint plans for NRM deliverables that address the NRM targets*, rather than just *improve partnerships*.

Page 20: Action 4 – funding is also a key issue here. Note also that the NGO NRM Working Group has been successful in investigating and developing partnerships. CCSA can play a significant role in helping with this Priority Action on an ongoing basis.

Page 20: Action 7 – need to consider broadening the base of reporters on environmental indicators to include community members, demographers etc. Important also to have compatibility across regions. To be effective, an allied action is the funding of research to develop good condition indicators. This is particularly required for the marine environment.

Page 21: Collection and Use of Knowledge: this could be strengthened by referring also to dissemination of the knowledge and science to the various partners – including NGOs and community members and groups.

Page 21: Determination of scale appears to be a useful principle. However, suggest that it would be helpful to indicate some of the scale issues that apply to each NRM target.

Page 21: Opportunities for collaboration: suggest that there would be value – either in this Plan or subsequently – for the specific collaboration groups or networks that the NRM Council expects to see in place for effective action.

Page 23: Appendix 1 – concern that the overall picture is not particularly good. Should there be some supporting analysis, and proposals for remedial action? Are there success stories that could be interleaved with this appendix?

Page 27: Appendix 1 – would be useful to include the atmosphere as one of the key natural resource management assets whose condition is being monitored. This is particularly relevant in and around mining sites and towns such as Whyalla and Port Pirie.