



**Conservation Council  
of South Australia Inc**

ABN 22 020 026 644

Level 1, 157 Franklin Street  
ADELAIDE SA 5000  
Ph: (08) 8223 5155  
Fax: (08) 8232 4782  
general@ccsa.asn.au  
[www.ccsa.asn.au](http://www.ccsa.asn.au)

## **Submission on the Proposal for a Transition to ‘New’ Natural Resource Management (NRM) Groups in the Adelaide and Mount Lofty Ranges NRM Region.**

Introduction

General Comments on the Proposal

Specific Comments on the Proposal for Consultation

Points for consultation:

- (a) the intention to abolish the four existing NRM Groups and replace them with three “new” NRM Groups covering the rural and peri-urban areas of the region
- (b) the intention to service the urban areas in the manner described above.
- (c) the internal boundaries of the three NRM Groups
- (d) the proposed names for the NRM Groups

### **Introduction**

The Conservation Council of South Australia (CCSA) is South Australia's peak non-government community environment organisation. Formed in 1971, it is an umbrella group for over 55 of the state's diverse environment groups, who represent some 60,000 individuals. CCSA represents considerable expertise across the broad range of natural resource management issues that the AMLR NRM Plan seeks to address.

CCSA is recognised as a Peak Body and Partner for delivering the goals of the State NRM Plan under the *Natural Resources Management Act 2004* (NRM Act). CCSA is represented on the State NRM Council, established by the NRM Act (Section 13) alongside South Australia's Farmers Federation, the Local Government Association and Aboriginal Landholding Bodies.

CCSA is pleased to make a submission on the proposal for a transition to new Natural Resource Management (NRM) Groups in the Adelaide and Mount Lofty Ranges NRM Region. This proposal is for both structural and operational changes in NRM Group operations.

### **General Comments on the Proposal**

CCSA is concerned that community consultation is being undertaken **after** approval to proceed with the changes has been given by the Minister. CCSA has received feedback from many community groups that have issues to raise, but have not done so because they do not consider their input will make a difference to the outcome. Community consultation that takes place when the outcome is a foregone conclusion comes across as a token gesture.

CCSA recognises that given the 'complex and highly contested domain of NRM', there is 'much to learn about how to make these new regional, community-based arrangements work effectively' (Lane, Cheers and Morrison 2005 p. 13). It is acknowledged that the AMLR NRM Board 'strongly supports the importance of retaining the community connections and involvement' (AMLR NRM Board, 2007, p. 3) via NRM Groups. However CCSA is concerned that the intent of the changes **may** disenfranchise and distance the very community which the sub-regional groups are aiming to engage with.

In recent research on operational aspects of the NRM Act it was concluded that:

'If government retains the upper hand, the new regime will not provide for regional citizen control. Much depends, therefore, on whether government personnel and

citizens engaged in the NRM regime are able to develop collaborative working relations in which the respective functions and roles of government and citizens are accorded respect' (Lane, et al., 2005, p. 22).

A key point is that greater community control and regional autonomy in this new regime can lead to revitalised community engagement and citizenship (Rose 2000) and can foster social capital that may lead to the improved functioning of regional bodies (Putnam, 1993). In other words, in order to provide the best opportunity for this regional planning process to be effective, the community must be engaged with NRM. NRM Groups offer the best point of contact to achieve this. However, community members, who constitute NRM Groups, must feel able to substantially input into both local planning and operations in order to maximise the opportunities for community engagement with NRM in all its guises.

CCSA is concerned that under this new proposal, NRM Groups will have further limited powers, roles and responsibilities. Within the Draft NRM Group Charter, the proposed 'Role of NRM Groups' and 'Terms of Reference' utilises language that removes both responsibility and action, and is replaced by passive words such as 'to support...'; 'provide assistance'; 'raise awareness'; 'champion' and so forth. The concern is that the NRM groups will not have a major role in taking the community's concerns forward. In the Natural Resource Management Act 2004 (the NRM Act), NRM Groups were envisaged to provide an important interface between the community and the NRM Board. CCSA regards the sideways shift of community representation in the governance of NRM budgets and works programmes to be a detrimental process which may well result in a significant setback in community involvement.

Further, CCSA has concerns for the initial consultation process undertaken in pursuit of the changes to NRM Groups. CCSA understands these changes were prompted by widespread NRM Group concerns with Board/Group processes leading to the 'Fit for the Future Review'. CCSA is concerned that the working group convened to review the 'Fit for the Future' review, appointed by the

Board, did not comprise a representative from any of the NRM Groups - only Board members, Senior Management and Group Co-ordinators. Given that 'genuine community engagement' is supposed to underpin this new regime, this exclusion of the community voice at such a critical time in the future of NRM groups is of concern.

CCSA also believes that to make an effective and considered submission, the AMLR NRM Board should have provided a discussion paper which included the proposed NRM Group Charter, terms of reference for the proposed advisory committees as well as information on planned engagement programs such as 'Sustainability Street'. It is difficult to assess the validity of such a proposal in the absence of adequate information. This information was provided to CCSA on application but should have been provided as part of the consultation process.

As CCSA understands it, the Board has identified the need to establish two new committees: Communication and Engagement and Technical and Major Projects. CCSA strongly supports the inclusion of NRM Group members on both committees in order to ensure adequate input and communication from the NRM Groups up to the Board. As well, given the intention for Boards to meet every 2 months and committees in the intervening month, CCSA questions whether there will be adequate opportunity for presentations to both groups. CCSA also believes that advice on Technical and Major Projects to be the role of NRM Groups. If not, as suggested above, the role of NRM Groups is limited and it is difficult to see how they will add value with this proposed structure.

The removal of the urban areas from the "oversight" of a community based and representative body covering the "service" area may lead to disenfranchisement and a degradation of the catchment focussed process. CCSA considers it important to maintain catchment wide communications and management.

## **Specific Comments on the Proposal for Consultation**

### **Points for consultation:**

**(a) the intention to abolish the four existing NRM Groups and replace them with three “new” NRM Groups covering the rural and peri-urban areas of the region**

CCSA supports the proposal to create three “new” NRM Groups with the amalgamation of the Southern and Fleurieu Groups, but not at the expense of separating the urban area from the Central NRM Group. CCSA is concerned that the original logic in taking a whole of catchment approach via the four NRM Groups was valid and followed the previous work done by Catchment Water Management Boards. If this proposed restructure occurs it is essential to facilitate good communication mechanisms across entire catchment areas.

### **Proposed Change to Organisational Model**

CCSA does not support the preferred organisational model outlined in Briefing Paper 6.1, Meeting 28 17/12/08. CCSA considers that a far more effective model, which ensures ongoing community engagement, would be to have the Operational/Technical Committees responsible to and/or taken up by the NRM Groups. This ‘Preferred Structure’ does not demonstrate current roles and responsibilities as defined in the NRM Act.

CCSA also considers that an NRM Board member is the logical person to Chair the NRM Group and enable more effective communication and reporting between the Board and Group.

CCSA regards this proposal as compromising the community’s ability to prioritise and approve expenditure of NRM levies as well as having an effective voice to express concerns over how on-ground works are undertaken in the region.

**(b) the intention to service the urban areas in the manner described above.**

CCSA considers it vital to ensure rural, peri-urban and urban areas are linked via a whole of catchment approach and not separated by these 'proposed' changes. CCSA is concerned that the developing interrelationship between urban and rural areas is maintained and stronger links are forged, not lessened via a separate system. Given that much time, effort and expense has gone into promoting the rationale for this approach it is unclear why the Board would now consider undermining its own logic. It was evident from the community workshops run in June/July 2007 for the regional plan that the rural and urban communities needed and wanted to be better educated about their catchment. It is acknowledged that although there is a disconnect between urban and rural areas there is a strong relationship which needs to be bolstered via a 'whole of catchment' approach. Also funds should not be earmarked 'urban' vs 'rural' but at the root cause of major NRM issues, which may be higher in the catchment.

There needs to be a demonstrated understanding within both sectors of the catchment community as to why rural programs are important and why urban communities need to receive "ecosystem services" from rural communities to protect water, soil and vegetation and food security.

CCSA believes that the 'Preferred Structure' as illustrated in Attachment 3 NRM Board Briefing paper 6.1 Meeting 28, 17/12/07 does not demonstrate the current responsibilities for NRM Groups as defined in the NRM Act with the intent to cover all areas under the auspices of an NRM Board. Given this, is the AMLR NRM Board also seeking amendments to the NRM Act with respect to NRM Group responsibilities?

It is difficult to understand how five Committees (Communications and Engagement, Technical and Major Projects, Water Resources, Water Allocation Planning and Coast, Estuarine and Marine), can effectively deliver

targeted programmes without a community forum interacting on a “level playing field”. There needs to be good mechanisms for reporting to NRM Groups and a separation of issues in these NRM sub-regions to ensure effort and funds are evenly distributed. CCSA supports the establishment of Committees for overarching issues that need to be consistent and coordinated across subregional boundaries, but does not see the need for a Technical and Major Projects Committee; as this should be the role of NRM Groups.

### **(c) the internal boundaries of the three NRM Groups**

The boundaries of the 3 proposed regions demonstrate a significant variety in land type and land use coverage and presumably would lead to a significant re-evaluation of resources to ensure that they are adequate to service the needs of all areas.

It is noted that the northern area is at least 3 times the extent of the Central region and will require special consideration in the distribution of resources due to the variety of environments and natural resource issues.

CCSA supports the proposal that the Central region covers the upper Torrens and upper Onkaparinga Catchment but not to the exclusion of the urban areas. CCSA supports the Fleurieu Region covering the lower Onkaparinga and all of the Fleurieu Peninsula.

### **(d) the proposed names for the NRM Groups**

The proposed names of the regions are not an issue.

## References

Adelaide and Mount Lofty Ranges NRM Board 2007, Board and NRM Group Governance Arrangements (Final), Briefing Note 6.1, Meeting Number 28-17 December 2007, Adelaide.

Government of South Australia 2004, *South Australia Natural Resources Management Act 2004*, Version 26.7.2007 Government of South Australia.

Putnam R 1993, *Making democracy work: civic traditions in modern Italy*, Princeton University Press, Princeton NJ.

Rose N 2000, 'Community, citizenship, and the third way', *American Behavioural Scientist*, vol. 43: 9, pp. 1395-1411.