



**Response to the
Alinytjara Wilurara Lands
Regional Draft Natural Regional
Management Plan**

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Introduction

The **Conservation Council of South Australia Inc (Conservation SA)** is the peak conservation body for South Australia, representing over 55 of the State's environment and conservation organisations.

Conservation SA is an independent non-profit, non-party-political, community based organisation that provides resources, advice and representation for the South Australian environmental movement and leads many of the key conservation campaigns in SA.

Conservation SA is known for its success in developing long-term community development, education and on-ground environmental restoration programs.

Conservation SA regularly liaises with Local, State and Federal Governments, agencies, media, educational institutions, NGOs, unions, industry, business and other groups on matters relating to the environment and social justice.

Conservation SA 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). Conservation SA 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.

Conservation SA's submission

Conservation SA is pleased to make a submission on this Draft NRM Plan and commends the Alinytjara Wilurara NRM Board's efforts.

This submission provides general comments on the Plan as well as specific comments in relation to Plan. Conservation SA sees the community as a key driver of NRM and believes NRM Plans should be drafted through a process of genuine community engagement. Therefore, specific comments are also provided on the consultation process that has occurred in the preparation of the plan and whether the plan is written and structured in a manner that is accessible to a diverse range of stakeholders.

General Comments

Alignment with NRM Act, State Plan and environmental legislation

Conservation SA believes the Draft NRM Plan is generally consistent with the NRM Act, State NRM Plan and other environmental legislation, but does lack specific details on sections of the NRM Act including:

- Section [75] [3] [b] [iv] regarding catchment to coast connectivity
- Section [75] [3] [d] regarding working with groups/ volunteers
 - o It is understood volunteers and community groups may not exist in the traditional sense; however, there is scope to investigate permission for volunteers to visit the region (if not on Aboriginal lands then at least on DEH owned lands) and seek financial support for associated transport
- Section [75] [3] [e] [i] and [ii] regarding monitoring methods
 - o Indicators of success have been drafted but these provide little detail on what the monitoring methods will actually involve. It is understood that a MERI plan is in the process of being drafted.
- Section [75] [5] regarding consistency with other state legislation
 - o Legislation is listed. It would be helpful to draw links with the NRM Plan and NRM Act.
- Section [75] [8] regarding the consideration of the plans of other NRM Boards
 - o The plans are mentioned in passing only. Given the limited investment to the AW region there is opportunity for the AW Board to collaborate with EP and the Arid Lands to gain greater leverage from projects and greater resources.

It is understood that little has been researched on the state and condition of natural resources in the AW; there are, however, many gaps that can be filled with existing knowledge and specific comments on these are provided in the Specific Comments section below.

Cross regional issues and implementation

It is understood that the region is quite isolated, but there are some issues with cross over regional boundaries such as buffel grass, camels and the Great Artesian Basin. There doesn't appear to be any mention of how the Board intends to work collaboratively with the SAAL region and other states to manage these risks. There also doesn't appear to be any mention of the GAB Coordinating Committee and what role it may play in regional decisions and in providing support.

The Plan does acknowledge long-term relationships with the community who live off country in other states (eg WA and NT) which is to be commended.

Deficiencies in the NRM Act which affect this Plan

Conservation SA has concerns regarding the impact that mining operations on the natural resources of the region as well as Aboriginal cultural sites, particularly as the Board has no legislative authority in this area. This concern also extends to tourism operations and other natural resource users where the Board has no legislated authority to act. It is unclear how regional Plans are to consider and treat such impacts.

Specific Comments

Community engagement

Genuine community consultation

- The Board is to be commended on holding an Adelaide- based meeting, which allowed a broader range of people to be engaged.
- The Board is to be commended on the number of pre-planning meetings held, as detailed in Appendix D, before the plan was drafted.

NRM Plan structure and readability

It is vital that the regional NRM Plan is a community tool and as such the language, structure and format facilitate community ownership and comprehension.

- The AW NRM Board is to be strongly commended on developing a regional plan that is genuinely directed towards community. The language used is down to earth and not laden with technical or bureaucratic jargon. There is a genuine attempt for any terms not commonly used by community members to be explained in the text, for example terms such as groundwater, capacity building are explained and phrases such as threatened fauna have been replaced by reference to a scarcity of animals in an attempt to be more meaningful to community. Other terms are explained on the same page. For example, chenopods are given a definition on page 16 when the term is used. The use of long-term outcomes as opposed to RCTs is also recommended and is more meaningful to community. The writing style is very easy to read and plan is well structured.
- It should be noted that whilst the language and writing style is community orientated, more could have been done to make this a community tool. For example, in the State of the Region report the management (called Helping Hand in the plan) could be expanded to include information on what the local community can do to help these landscapes and assets.
- Whilst the maps throughout the plan are community orientated and attractive, some are very difficult to read eg the precise boundaries of the nine landscape zones and locations of the conservation parks and marine parks are difficult to determine.

Facilitate understanding of NRM

It is important that the community have a clear understanding of what NRM is, its role and the role of the Plan in order to understand how they can contribute and participate.

- The description of the NRM Plan's intent and the individual volumes is commended and provides a clear overview of the Plan.

Other general comments

- Community summary: The summary sheet included with the Draft Regional NRM Plan is easy to read and comprehensive. It covers the important aspects on what NRM is, who the Board are, what the plan covers and the key elements of the regional assets, threats, health and proposed actions.

- Given the likely impacts of climate change to the communities and natural resources of the region, a higher profile and greater integration of climate change as a threat and strategic issue for the Board would strengthen the plan.
- Feedback form: The feedback form is useful. It provides direction for community with specific questions on each volume and has adequately described how feedback will be utilised. The questions asking for feedback on the consultation process and how the community wish to be engaged in the future is also commended.
- Given that the governance of the AW region is experimental in a national context, it requires greater resources than most other regions. In order for the NRM Plan to be owned by community, there needs to be adequate provisions for effective and sustained consultation and communications. It is recognised that consultation will take longer in this region, thus there needs to be adequate resourcing to enable participants to attend on-going consultation and information sessions.
- One of the keys to the success of the AW NRM Board in managing the natural resources of the region is to have access and good working relationships with all areas of the region, conservation SA is supportive of the State Government continuing to work with the land and community authorities within the region to ensure these issues are resolved and strengthened to attract maximum investment for NRM and community outcomes across the region.
- Conservation SA supports on-going review (when the NRM Act is reviewed) of NRM Board membership to ensure it provides effective representation for the region. Conservation SA does not believe maintaining consistency with other Boards should be an obstacle to ensuring the community have confidence in the AW Board's make-up.
- Conservation SA is concerned by the lack of discretionary funding the AW Board has access to. Without additional funds, their ability to prioritise regional and local NRM priorities is severely hampered. An example of this is funding water management planning. Without discretionary funding it is also difficult to leverage external investment in the region.
- Conservation SA encourages the AW NRM Board to develop on-going engagement strategies across the region.

Introduction

- Page 14: It is great to see a regional plan recognise marine parks along with other protected areas. However, the Far West Coast Marine Protected Area is not mentioned here. This Park encompasses the Great Australian Bight Marine Park. The GAB Marine Park should also be placed on figure 1.2/ the map of other conservation areas. These should also be mentioned on page 13 with the other lands and waters.
- Page 20: Under people the general lack of human capacity to implement projects could also be listed as a threat. Is communication with various languages in the region also a challenge - if so how will the Board address this?

- Page 21: 'Threats to Country' should include unsustainable commercial fishing (four of SA's 21 fisheries are recognised by PIRSA as being 'over fished' and another three are 'environmentally limited'). For example, the number of school sharks are estimated to be between 9% and 14% of their original population.
- Table 1,2 The down-to-earth and meaningful interpretation of the State NRM Plan Goals should be commended.
- Page 25: Expand on the links to other legislation and policies ie how the Board fits into this.
- Page 28: The vision and goals are straightforward and cover the important aspects of NRM in the region.
- Page 28: The guiding principles seem to be missing important aspects covered in the State NRM Plan's guiding principles such as NRM being everyone's responsibility and the need for a landscape-scale and ecosystem based approach to NRM.

State of the Region

- Page 39 – 41: The conservation ratings here are not all mentioned. Provide the ratings and the level (eg national, state or regionally listed) for each threatened species. It might help to have this information in a table for each landscape. The conservation ratings for Hooded Plover, Great White Sharks (listed under EPBC, Convention on Migratory Species, Fisheries Management Act and the Convention on International Trade in Endangered Species), Humpback Whales, Blue Whales, and School Sharks are not mentioned. There are also a few species not mentioned such as Basking Shark (listed under EPBC and the Convention on Migratory Species) and NZ Fur Seal (protected under EPBC Act). And those that are listed rarely have whether they are protected nationally, internationally or within the state eg White-bellied Sea Eagles are mentioned as threatened but it is not mentioned whether this rating is national, statewide. It may also be useful, here and elsewhere, to include the scientific names for each of these species, as there can be confusion and discrepancies with the use of common names.
- Page 40: There is mention of coastal vegetation communities, but not any of the fauna in these systems. If this is an information gap then it would be useful to say so.
- Page 40: It is positive to see the unique and endemic invertebrate fauna, algae and marine plants mentioned.
- Page 41: States the issue of 'open access' in relation to reducing nesting success. This could be further elaborated eg is this due to 4WD, camping, tourist interactions with wildlife etc...
- The Head of the Bight is mentioned under this landscape, but based on the map on page 39 it appears as though this is in the Yalata Coast rather than Bunda Cliffs. Maps need to be clearer for readers outside of the region.

- Page 41: This section on causes for concern understates the threats to this landscape and could be strengthened by adding several important points. Information should be included here regarding fisheries, as too the vulnerability of the White Shark, especially given its vital role as a top predator. The impacts of human access upon nesting habitats, dune erosion and plant recruitment in the coastal zone should also be mentioned as a key threatening process. Climate change is also likely to have an impact upon marine habitat and coastal habitat.
- Page 42: Under threatened species, it should be noted that shark numbers are believed to be declining.
- Page 46: As for the Bunda Cliffs landscape above, it would be useful to include a table of threatened species here. Also include species names for all species listed and their conservation ratings.
- Page 46: It would be good to include some more information on the Yalata Swamp eg are there any fish in this swamp? Is any of this water used by local peoples? If this is unknown report it as an information gap.
- Page 50: Again, it would be good to tabulate threatened and endemic species. Only a couple are mentioned here and their conservation ratings are not specified. Same comments should be regarded for all other landscapes and seascapes.
- Page 51: The plan mentions endemic fauna of the karst cave systems and it would be good to provide a few examples.
- Page 52: Biosurveys have been conducted of the Nullarbor¹. Whilst some of these reports include WA there may be information that can be extracted. It should be noted that this Biodiversity Assessment regarded the Nullarbor to be fair with a declining trend.
- Recently (22/1/10) the SA government released a report on the Proposed Nullarbor Wilderness Protection Area. The proposal is to protect 900,000ha. The final NRM Plan should mention this. If this area is proclaimed then it is important that a commitment is made to on-going management and provisions for funding for an Aboriginal Ranger Program.
- Under causes for concern, it may be useful to list the increasing threats from tourisms upon the Karst systems and coastal systems. Also mention the threats of uncontrolled (eg vandalism, spray painting) and controlled visitation (eg driving on tracks in wet conditions can cause damage to traditional Aboriginal tracks). This is a threat not just in the Nullarbor, but also other various areas of the region. There needs to be adequate plans in place for the management of this risk to the Nullarbor and Aboriginal historic sites of the region, particularly the Murrawidgini Caves – the only advertised caves open to the public.
- Page 58: Could mention that a biological survey of the Yalata Lands is underway and some results were presented in October 2008 (AW NRM Board newsletter <http://www.aboriginalnrm.com.au/links/aw/AW%20Newsletter%20Edition%201%202008.pdf>) Some of this could at least form some baseline data.

- Page 64: Two frogs are reported in the area² and it would be good to include this information in either the biodiversity or water section.
- Page 64: No indication is made if water extraction for mining is believed to be a potential threat. There is no trend information in relation to water. If this is a knowledge gap it would be useful to say so and ensure it is included in the section on research.
- Page 69: Explain what some of these vegetation communities are.
- Page 70 – 71: The Plan mentions that the Ooldea Soak was 'previously' a reliable source of water. This indicates that it is no longer reliable. Can the Board speculate as to why it is not now? Has it been over-extracted or is this due to changing climate? If the former, then is there any knowledge on whether this is possibly due to mining or general community use.
- With the helping hand, which discusses management, it might be possible to include the types of activities that occur by the local people through caring for country and not just activities operating by the Board and other government agencies. As it reads at present it sounds as if there is very little going on in the region, when it is presumed the indigenous land custodians are active. Perhaps discuss the types of on-ground works that occur in the region.
- In each of the landscapes the 'cause for concern' section is not very detailed. For example are there more potential impacts from mining other than tracks (eg pollution, tailings, vegetation clearance). They can at least be listed as potential impacts if causation between mining management and resource condition is unclear,
- Page 83: The Plan states that 'health and trend ratings are largely assumed due to limited monitoring of this land related to mineral exploration', subsequently access to data from mining companies and lack of access to mining land for research should be considered a risk to management.
- Page 83: Specify the degrading influences upon watercourses such as stock trampling, saltation to help educate the community on management and issues.
- Page 89: It may be worth mentioning Great Artesian Basin work. Does any monitoring occur in this part of the GAB? If not mentioned this as an information gap and the need to work collaboratively with other regions and the GAB Steering Committee.
- In the state of the region report, it would be good to include maps of the known vegetation types.

Strategic Plan 2010 - 2020

- Page 94: It was good to see information on how the targets etc... were determined and that it involved a good mix of community and technical expertise.

- Page 98: It would be useful to expand on the MERI acronym and maybe include the standard flowchart/ cycle. Also include how the Board will monitor on its own success of business administration and report these to the community.
- Page 100: There appears to be a lot of repetition within the outcomes. Also it says these outcomes are compared to 2009 baseline; this baseline should be explained. Was this baseline data collected by a survey? If so, it may be worth incorporating some of these results in the people section of the state of the region report.
- Page 108: Mentions working with partner regions on pest issues, it would be useful to specify which ones and what projects exist. Again need to be specific throughout the plan.
- Page 109: It is good to see the Board working to engage with mining, pastoralism and fisheries. Provide some examples of how they have or will intend to do this.
- Page 110: Would change wording to '...water at fifty **priority** locations' so that this target is more strategic. The Board should be able to at least visually assess based on size and visual degradation and possibly some pre-existing data, which water holes are of greatest priority. If not undertake brief community consultation/ survey on what they perceive to be the priority waterholes.
- Page 113: It is unclear whether water allocation planning will occur over the whole area. This should also be a partner program and DWLBC should be taking an active role in this.
- Page 113: With the ecological surveys in relation to water quality monitoring, there should also be baseline data collected on whether any unique fish, macroinvertebrates or macrophytes exist in these water holes.
- Page 116: The link between strategies and goals/ outcomes is unclear.

Business Plan 2010 - 2013

- Page 126: It is understood there are no levy funds. The Board should potentially highlight this as a risk and present a case for a levy perhaps by industry such as mining. Alternatively, aim to develop partnership projects where the mining industry invests in regional projects, especially to investigate biodiversity values and health in their area of operation.
- Page 128: it is unclear whether the programs listed here are in addition to the investment mentioned on page 127
- Page 131: It is uncertain that the \$200K/ year will be enough to undertake WAP and all the monitoring listed for the water asset. It also seems at odds with page 141 that suggests water is one of the highest priority issues, and yet very little investment is made towards this asset.

- As the governance of the AW region is an experimental model in a national context, consideration should be given in the Business Plan to how funds are allocated to the range of Aboriginal groups who manage natural resources on their traditional lands.
- The employment opportunities for local people should be emphasised in this section in keeping with the profile this issue is given in the first volume.
- The need for a strong collaborative approach between DEH and the AW NRM Board needs to be emphasised either in the Business plan or Strategic plan. This is especially important given the amount of land owned by DEH and the need to work together to research and manage resources.

Appendices

- Page 146: A range of legislation are listed, but there is no explanation of what they cover or the Board's role in this, especially in relation to the Native Vegetation Act.
- Page 149: Lists policies such as Nature Links, No Species Loss, but does not mention links of these to the Board's operations. Does not appear to mention other regional plans eg EP and SAAL.
- Page 153: Include biosurveys of waterholes in Table A1.
- Page 163: It would be good to keep the writing style consistent for the regulatory section as this slips back into bureaucratic speech. It is good to explain 'duty of care', but explain this in a meaningful way to community. This is more or less extracted from the NRM Act and not as community-orientated as the rest of the plan.
- Page 167: There is no listing of pests declared in region – a few are mentioned in state of region report eg buffel grass. What other pest plants and animals are declared? What others pose risks? Which should be eradicated vs monitored. Include a table here or include much more information on pests in the State of the Region report.
- Include in the regulatory section a paragraph regarding WAP. For example, where will this occur etc...?
- Page 171: Include the impacts of climate change upon freshwater, groundwater and marine systems. For example, in relation to marine include the impact of sea level rise upon algal communities, the threat of ocean acidification and impacts upon breeding in relation to changes in water temperature. Even if not regionally specific, there is much research regarding these potential impacts.

References

¹ Australian Natural Resources Atlas [accessed online 31/1/10]
<http://www.anra.gov.au/topics/vegetation/assessment/sa/ibra-nullarbor.html#wetlands>

²A Review of Yellabinna Regional Reserve (Draft) 1990 - 2000 (1999) Department for Environment, Heritage and Aboriginal Affairs; Adelaide, South Australia [accessed online 31/1/10]

http://www.environment.sa.gov.au/deh/pdfs/yellabinna_regional_reserve.pdf