



# Conservation Council SA

## Discussion Paper on State NRM Plan Revision 2010

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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. It provides resources, advice and representation for the SA 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, Government agencies, media, educational institutions, NGOs, unions, industry, business and other groups on matters relating to the environment and social justice.

As a community organisation, much of what Conservation SA achieves is through a large network of skilled volunteers from all walks of life as well as its office, on-ground, governance and campaign activities.

## Executive summary

Conservation SA is pleased to make a submission on the Discussion Paper for the State NRM Plan Revisions 2010. A range of Non-Government organisations have contributed to these responses.

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.

This submission provides responses to the questions posed in the discussion paper.

Conservation SA has provided a number of suggestions for the revision of the State NRM Plan in regards to content, delivery arrangements and its future direction. The key suggestions and comments include the following:

- the importance of the guiding principles and ensuring these have greater influence with other planning documents, government agencies and developments
- the importance of the implementation plan
- the importance of developing a state M&E plan to ensure accountability and ensuring this is flexible enough to account for the difficulty in measuring natural resource outcomes
- improvements in community engagement by ensuring a bottom-up approach to partnership development and ensuring NGOs are involved in planning and project delivery at all stages
- improvements in linkages and cooperation with all tiers of government and having clearly defined responsibilities for all agencies
- ensuring greater consideration of climate change and that NRM is the main driver and deliverer of adaptation and mitigation
- clarification over NRM Group roles
- clearly articulated boundaries between the responsibilities of the NRM Council, the regional Boards and government agencies.
- ensuring targets are more inclusive, ambitious and that responsibilities are clearly articulated
- provide greater transparency on Board appointments
- provide greater transparency on NRM outcomes and decision making
- provide greater guidance to regions on how they contribute to statewide NRM.

## **Comments on the questions raised in the discussion paper**

### **Have you used the current Plan?**

- Conservation SA predominantly uses the plan to draw strategic links. The guiding principles are used to shape and guide Conservation SA's philosophy and project delivery.
- A small number of non-government organisations (NGOs), including Conservation SA's member groups, have reported that they use the State NRM Plan in preparing grant applications; however, regional plans have been reported to be of greater relevance in this instance.

### **Were you involved in the review and evaluation of the Plan?**

- The CCSA nominee on NRM Council and NRM Facilitator were interviewed by Interpart (Barry Lincoln) regarding the implementation of the State NRM Plan
- CCSA nominee on NRM Council provided input through Council review mechanisms
- NRM Facilitator interviewed by Leanne Muffett on progress made towards achieving Goal 3 of the State NRM Plan
- NRM Facilitator coordinated the evaluation of strategy for 3.4.4 for State NRM Plan

### **What improvements could have made the review process more useful?**

- As a partner to the State NRM Plan and contributor to the independent review Conservation SA would have appreciated more detailed feedback on the results of the review. Certainly a brief description of the review outcomes plus feedback on how key stakeholders saw where NRM was positioned.

### **What components of a State NRM Plan are important to you?**

Key components:

- The guiding principles in the State NRM Plan are considered a vital component, especially in their role of influencing other planning documents and government departments. These guiding principles are seen as a philosophy that should be incorporated into all other state planning documents, such as the South Australian Strategic Plan (SASP) and Development Plans.
- The guiding principles are also seen as a tool for NRM Council, Boards and NRM Groups to make decisions about how they implement their business and deliver projects. Whereas the plan itself says what NRM should be achieved, the principles importantly state how.
- The delineation of strategic links in the State NRM Plan are seen as important; however, these could be more clearly described in the next rendition of the plan. Linkages between regional and state strategies and goals could be better described and the linkages between the various planning documents and agency responsibilities still remain somewhat ambiguous.

- The Implementation Plan will be a crucial component for the next plan. This will require commitment from all NRM partners and will need to be developed with complete transparency.
- It is unfortunate that after nearly 5 years there is no State M&E Plan. Unless the State and Regional Plans are monitored and evaluated then there can be no confidence in their effectiveness. Thus a monitoring and evaluation plan is seen as a vital part of the State Plan and to deliver this will need more than high level guidance in the State Plan. At the same time, it needs to be recognised that not all natural resource assets are easily or quickly monitored and evaluated, so evaluation targets and techniques may need to remain flexible and possibly qualitative in order to ensure all key natural resource issues remain within the plan and adequately evaluated.

### **What do you identify as the important strategic issues for NRM beyond 2010?**

- Community engagement is an important strategic issue for the future and this includes the following:
  - Education of the community (including NRM Board members, staff, NRM Council members, government agencies and the broader community) on what NRM and ecologically sustainable development (ESD) is as well as its implications for the future of the state and regions. From the broader community perspective it is important to describe what natural resources actually are (as there is no definition in the main text in the current State NRM Plan) and an explanation of what natural resources are covered by the NRM Act and NRM Plan and why. There is some sentiment in the community that NRM (Boards/Council) are not doing enough in terms of working with EPA, mining developments, planning, etc. and there needs to be clearer explanation in both state and regional plans as to why this is the case.
  - In order to help engage a broader audience, the State NRM Plan should be written in a manner that is more community orientated. This includes providing explanations of NRM terminology and NRM philosophies, not just in a glossary that is complicated with even more NRM terms, but in the context of project delivery with 'real' world examples. The regional plans have successfully incorporated case studies to exemplify the application of the plan's content. For example, the State NRM Plan would benefit from including examples or further explanations of the application of guiding principles such as 'landscape-scale', 'adaptive management' and so forth.
- NRM principles and strategies will need to have greater influence on decision makers, planning and development. The NRM principles should be integrated into other plans such as SASP and development plans. A key strategic direction beyond 2010 is positioning the State NRM Plan within other plans and defining linkages as well as conflicts between them (e.g. projected population growth within SASP needs to incorporate the subsequent impacts on natural resources and processes to alleviate these impacts). Given we will have a State Plan and regional plans for all 8 regions shortly we would expect state agencies, in particular, to develop with the Boards implementation plans.
- In addition to NRM having greater guidance and linkages with planning documents at the statewide level, there needs to be stronger linkages with the Commonwealth,

especially in relation to legislation such as the EPBC Act and national climate reduction strategies. Threatened species are barely mentioned in the current State NRM Plan nor in many of the regional plans. Instead of dividing ownership of responsibilities between various tiers of government, there needs to be greater linkages and cross-over in order for states and regions to make their contributions towards nation-wide and global issues.

- NRM should strategically position itself as the main driver and deliverer of NRM climate change adaptation and mitigation strategies. In order to do this, the State NRM Plan needs to clearly define linkages between other strategies at state, national and even global levels and bring in other portfolios.
- Achieving community ownership of NRM should be a key focus and there will need to be a shift towards a more bottom-up approach and genuine community engagement by ensuring that community are involved in NRM at all stages (not just by providing comments on draft plans). This includes project development and delivery.
- Triple bottom line will remain a strategic issue and this needs to be fleshed out more and principles for actually achieving this need to be in place.
- Monitoring and Evaluation (M&E) will be an important focus beyond 2010. This needs to be clearly and effectively communicated in the State NRM Plan in order to demonstrate what the NRM sector has achieved and its value for money. In order to emphasise value for money and efficiency, the State NRM Plan will need to develop processes to capture the on-ground changes occurring outside the scope of NRM Boards. At present this is poorly reflected in reporting structures. Many of the NRM outcomes are derived from altruistic implementation by volunteers and farmers. Boards have tended to focus reporting on those directly involved with NRM financial subsidies or projects. Part of being able to report on these altruistic achievements will occur through strengthening community engagement and by NRM understanding what is going on outside their own spheres of influence.

**How could the NRM arrangements be improved to deliver positive outcomes for those strategic issues identified above?**

- Arrangements could be improved by strengthening community engagement (as mentioned below) and ensuring that NGOs are sufficiently engaged in NRM processes such as planning, project delivery and M&E. The MOU (in preparation by the NGO NRM Working Group) sets a terrific course for this to be achieved if it is fully supported.
- As mentioned above, ensuring greater influence over decision makers through NRM reform would help. In particular we see little need for the State agencies responsible for NRM developing their own strategic plans. They should just have implementation plans.
- A major impediment to delivery of NRM in the State is the past reduction in Government funding. Also indications are the State budget will cut funding even further. This direction needs to be reversed rapidly.
- A current gap in NRM implementation is the uncertainty over the role and responsibilities of NRM Groups. Many NRM Groups are underutilised and are not functioning in their intended capacity to address and report on issues and needs at the local grass-roots level. The Conservation Council is supportive of the NRM

Council pursuing an evaluation of how the NRM Group concept has been implemented across the state and to determine the most effective means of community engagement and local delivery of NRM.

- NRM Board Appointments:
  - In order to increase community support for the Board, it would be worth providing **more** explanation as to the skill level of new Board appointees to the community.
  - In order to ensure Boards are able to attract potential candidates with the right skill mix, it is vital that Boards are **overt** in cultivating interest within their regions. The Conservation Council is supportive of much more robust processes for the recruitment, selection and governance training for Board members and is happy to have further conversations to that end.
  - This also involves appropriate succession planning. As an example candidates with Coast and/or Marine skills tend to be short on the ground.
  - Greater transparency is recommended around the appointment of Presiding Chairs rather than solely at the Ministers discretion. This would include ensuring there is a public advertisement posted when there are vacancies for Chairs.
- Greater transparency around NRM Board decision making and achievements could be addressed with a requirement that Boards hold an Annual General meeting where staff, Board and Group members are available to speak with the community and where there is an opportunity for information sharing and open communication.
- There needs to be greater emphasis on the training and ongoing skill and career development of NRM workers.
- There need to be clearly articulated boundaries between the responsibilities of the NRM Council, the regional Boards and government agencies, especially in light of the DENR/ NRM merger process. Further, the relative responsibilities of the Council, the CE of DENR and the responsibilities for land management as articulated in a number of other Acts including the National Parks and Wildlife Act (as amended) need to be articulated.

**How best could a new Plan assist in effectively addressing challenges beyond this decade?**

- A robust and adaptable Monitoring & Evaluation framework is essential. Such a M&E framework must be adopted state-wide. At this stage we have each region developing their own approach as they have no approved State plan to follow.
- Ensure that all plans use data that are projective of future conditions (not current conditions) e.g. water allocation needs to reflect longer-term climate change and population trends.
- Clearly articulating a natural resource vision for the state, not just with a few wordy statements, but instead defining how we are going to use our limited resources and where regions sit in a statewide context. This would be an integrated vision that incorporates social and economic goals and is applicable across various sectors, not just the environmental sector. This may need to be a specific piece of work that does not replace the vision statement, but complements it by providing broader context about where NRM in SA needs to head to carve out a future in a changing

climate and where regions may best contribute to this. Such a vision should also reflect triple bottom line objectives.

In other words, the State NRM Plan should be presented within the context of national and global NRM issues and then it should provide clear direction how the regions can sit within the context of statewide issues. A tool to achieve this may be to include some components of the state and condition of natural resources within the plan itself. Whilst the State of the Environment report provides this information, the SoE does not articulate the linkages between state and regional priorities. An example would be to include statewide resource asset and threatening process maps that are overlaid with regional boundaries to show how the regions can contribute to threat abatement and asset protection at a statewide level.

### **How can the new Plan improve in meeting triple-bottom line objectives?**

- Work to position for influence within the triple bottom line
- By being well supported and engaged
- By having an assertive tone rather than a responsive tone - the community WANTS to see NRM as the driver, being on the front foot whilst bringing people along the journey
- By driving a culture of change
- By ensuring there is greater influence over development plans and clearly defined mechanisms for cooperative approaches between all tiers of government
- By supporting NRM boards to be genuinely influential in setting the regional direction for NRM
- Priority needs to be given to living within ecological limits and ensuring ecological sustainable limits are incorporated into triple-bottom line objectives; not, as is often the case, defining economic needs and leaving the rest to the environment. It needs to be recognised that ecological sustainable limits are non-negotiable, if we exceed these (e.g. reduce end-stream water flows from what the system needs environmentally) then we cannot develop the state in an ecologically sustainable manner.
- There needs to be on-going dialogue between NRM agencies, economic development agencies and government and broader engagement with economic development boards about NRM.

### **What targets and measures do you see as critical to assess progress in**

General comments:

- Targets and strategies are currently at different levels (e.g. some are very specific others are generic). It would be useful if there is some consistency to the level targets and strategies are presented.
- Many targets need to be more ambitious. It is not believed that they are currently based on what needs to happen in order to manage natural resources sustainably. Many of the targets are qualitative and we should now be in a position to apply quantitative levels for improvement of the resource asset.

- It would be useful to strengthen the wording of some of the target so that we are achieving tangible outcomes (e.g. target 1.3.2 regarding CARRS just says 'Embrace the philosophy' which does not imply that anything needs to change, a more appropriate target would be to increase the state's protected area network in the state so that it is in line with CARRS philosophies)
- There needs to be clearly defined responsibilities for strategies. For example, it is unclear which strategies are to be incorporated into regional NRM plans vs those directly implemented by state government vs federal government. Also it remains unclear whether the strategies presented are those required to achieve sustainable NRM by all sectors or just the NRM sector.
- There needs to be greater integrated decision making.
- There needs to be evidence of influence at multiple levels.

#### NGO Sector Interests regarding Targets:

- There need to be more inclusive marine targets in the plan.
- Biosecurity targets need to ensure no new incursions are allowed to establish.
- There need to be clearly articulated community engagement targets.
- The biodiversity targets are somewhat narrow – likely confined by the lack of data available – and there needs to be recognition that in terms of biodiversity reporting it is not always easy to measure. There may also need to be flexible targets to accommodate climate change.
- There needs to be a target around implementing Nature Links and the adoption of Nature Link principles.
- There needs to be a target to commit to renewable energy in South Australia.
- There should be a target that ensures all water resources are prescribed or the development of a statewide water allocation plan (the Water for Good plan does not adequately address this gap).
- There should be a target to ensure that all documents, plans and development proposals will be consistent with the State NRM Plan and its guiding principles.

#### **How can NRM improve in engagement with regional communities and stakeholders?**

- NRM needs to develop partnerships with various stakeholders in the community. Such partnerships, from the point of view of NRM, must be based on a level playing field and NOT a top-down approach. The structural arrangements for delivering NRM must reflect this. If decision-making at the regional level must be deferred to the state level then the regional communities will not play ball. If the people in the region actually believe that they can influence and actually make meaningful, money investing decisions for their region then things will happen. This is the ongoing and vital balancing act with implementing the NRM Act in SA.
- The Conservation Council is supportive of the development of community engagement principles that extend beyond the legislative requirements in the NRM Act. This might include principles along the lines of adapting communication methods to suit community needs and so on.

- Such principles could complement a broader capacity building strategy. The Conservation Council would be happy to be involved in further discussions regarding this.
- The Conservation Council supports the tone of the 2006 State NRM Plan in terms of the encouragement of developing partnerships across the NRM space to achieve more effective NRM outcomes. We want to see this tone (regarding partnership delivery) supported throughout the Implementation Plan via language, strategies and actions. Once again the MOU (in prep) will provide excellent guidance.
- Ensure the tone of the State NRM Plan embraces and celebrates diversity across all stakeholders.
- In order for community engagement to be effective, it is important that NRM Boards are fully supported by Ministers and adequately funded for engagement activities.
- Ensure a clearly articulated Community Engagement Strategy within the Implementation Plan.
- Recognise the important role of NRM workers to engage with communities and develop their skills and career paths accordingly (i.e. rather than short-term contracts with no career paths, etc.).

**What is your level of interest and what involvement do you want in the development of the draft plan that will be endorsed by Council and the Minister in 2011 following public consultation?**

- As a Peak Body in the NRM Act (2004), the Conservation Council has a strong interest in being consulted throughout the revision of the State NRM Plan.
- Key areas that the Conservation Council would be interested in being involved are developing content around the Principles, Targets and Implementation Plan.