



Conservation
Council SA

Response to the Draft South East Natural Resource 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 South East NRM Board's efforts.

This submission provides general comments on the Plan as well as specific comments in relation to the 2 volumes. 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.

Further information could have been provided on Section [75] [3] [e] regarding methods of monitoring.

Cross regional issues and implementation

Section 1.8 generally describes cross regional implications and adjacent NRM/ CMA regions and some of the projects that operate over regional boundaries.

Specific Comments

Community engagement

Genuine community consultation

- The statutory 2-month consultation period on the plan over the summer period may have hampered some community members and agencies in making informed submissions. If the plan was to be released over the summer holiday period, then a consultation period longer than the bare minimum required would have been appropriate.
- There were a limited number of formal public meetings on the draft plan and none held outside of the region, which may have limited informed input by stakeholders outside of the region.

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.

- Generally, the language used in the plan is straightforward and not laden with technical and bureaucratic jargon.
- There are some minor issues with consistency between sections (eg with punctuation, dot point formatting etc...). There are also a couple of minor grammatical and typographical errors that should be fixed up before the final plan is released.

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.
- An explanation of what NRM is and how the NRM Boards came about may be useful to include in the introductory sections of the draft Plan.

Other general comments

- **Fact sheets:** The fact sheets included with the Draft Regional NRM Plan are useful and provide an overview of the intention of plan. The fact sheet on The SE NRM Board provides a very clear overview of what NRM is, who the Board are, what the Board and Groups do and the purpose of consultation on the Plan. Likewise, the fact sheet on NRM Planning clearly explains the content of the plan, how it has been developed and its intent. The tailored plans for landholders, community and local government are also useful.
- **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 regional plan is quite long so it may be useful to develop a community orientated summary document that covers all the vital points from the plan. Whilst the fact sheets cover the contextual framework of the plan, it would be good to have a summary document that covers the main assets, threats and actions in an easy to read format. Many community people will not read such a lengthy document, so a summary sheet would be useful. Alternatively, include an executive summary in the plan.
- It may be useful to include some case studies of projects that have or will continue to operate, especially those that are undertaken by community or in partnership with the Board. This may help give the plan more of a community feel and help exemplify the type of projects that will be implemented.

Part 1: Regional description

- **Page 14:** Change the wording under section 1.3 to read, "The natural resources **covered by the NRM Act** include soil, water resources, geological features and landscapes, native vegetation, native animals and other native organisms, and ecosystems". As natural resources are more inclusive than those listed eg atmosphere, minerals, oil etc...
- **Page 14:** The section addressing 'what is NRM' needs to be upfront before the regional description. Before you start using NRM terminology, it needs to be explained.
- **Page 16:** Provide a map of the NRM Region and NRM Group boundaries upfront in the plan and not just in the appendix. Alternatively, include a cross reference/ hyperlink to the map when the region and NRM Groups are first mentioned.
- **Page 20:** The structure of table 1 is a little confusing as to whether the language groups directly align with the Aboriginal organisations listed.
- **Page 52:** It is great to see an explanation of biodiversity and that it is not assumed community have this knowledge. This demonstrates the Board has directed the Plan towards community and not just other NRM workers and bureaucrats.
- **Page 59:** Table 14 should include state conservation status for freshwater fishes as per the draft (2007) and final SA Freshwater Fish Action Plan (Hammer *et al.* 2009) –

relevant species are listed here in Appendix 1. It would be worth reviewing biodiversity recommendations to incorporate information from this plan. Our member group NFA(SA) has advised us that a complimentary copy has been sent to the Board.

- Page 62, 3.4.1 Mammals and a general comment for the document: "A quarter of the native mammal species known to be present in the SE NRM Region at the time of European settlement are now extinct." While descriptive it is a bit dismissive as a first line introduction, and may lessen public support for action. Start with a more positive fact.

Page 63, 3.4.3 Freshwater Fishes: Total now includes 20 freshwater native species – see Action Plan. Four species are listed as VU under the EPBC Act, 4 are protected under the *Fisheries Management Act 2007* (supersedes *Fisheries Act 1982*), and 15 of state conservation concern (2009 Action Plan list). The fauna represents over 30% of the total number of species in the state.

- Page 74, 3.7.1 Swamps and Marshes: this habitat type is important habitat of Dwarf Galaxias.
- Page 81: the threat to rising springs by abstraction cannot be overstated. You should specifically mention the role of groundwater abstraction for irrigation as a threat within 'changes to regional groundwater'. No mention of the critical recent habitat changes at Ewens Ponds a (or the) key site for aquatic biodiversity in the SE – key issue and knowledge gap. Current management should include the role of water allocation planning and the need to introduce adequate Environmental Water Provisions and safeguards.
- Page 82: 'with unlisted species that are uncommon across' should read regionally (SE and SA) threatened species. Hammer (2009) or Slater and Hammer (2009) are not in the reference list?
- Page 83: State, Condition and Trends – streams are key hotspots and refuges for aquatic biodiversity rather than simply 'generally degraded' – they still retain important ecological value for restoration and catchment management.
- Page 84: 'Drains support biodiversity values in their own right' Excellent that this is acknowledged, although it should be clear that there are no alternatives for natural habitat and that opportunities for enhancement should be sought rather than just management of existing drainage practices.
- Page 87: 3.8.2. Again abstractive use and lowering of groundwater levels/surface water interaction must be mentioned as a key threat. This is a good way to link Sections 3 and 6 better.
- Page 89: 3.8.7 Disease: Introduction or movement of fish and other organisms (e.g. carp, hatchery produced fish, yabbies) could introduce new harmful diseases and parasites to native species.
- Page 90: Salinity: There is a strong need to mention the role of salinity in influencing (altering) aquatic communities. e.g. many freshwater fishes are impacted by high

salinity (lethal levels, but also sub-lethal impacts such as failed spawning and more sensitive species being outcompeted by tolerant species).

- Page 91: climate change: be good to add in at least one reference to strengthen this section: e.g. McInnes et al (2003).
- Page 95: 'The Mosquito Creek Project, delivered by the SE NRM Board, aims to support the commitment of these organisations and farmers to achieve integrated management of shared surface water catchments' ...to ensure the long-term sustainability of environmental, social and economic values.
- Page 96. 3.10.8 Threatened Species and Ecological Community Recovery – a good place for a paragraph summarising the SA Freshwater Fish Action Plan and the regional Drought Response Plan for fish (Slater and Hammer 2009).
- Section 4, page 100: In the biodiversity section, it states the coast, estuarine and marine biodiversity will be addressed in section 4, however there is not a large focus on *biodiversity in the estuarine* and marine sections.
- Page 107: The threat of off-road vehicles is mentioned, however the threat of tourism should be further emphasised. This is a growing issue in the region in the coastal zone and it is not mentioned directly and is potentially downplayed.
- Section 4.2, Page 109: In the overview on estuaries mention the importance for fish nursery habitat, which is relevant to some of the SE estuary systems. Other than plant species, there is no mention of estuarine biodiversity, such as fish and macroinvertebrates.
- Section 4.3, page 112: Include in this section key biodiversity areas (like you have for the biodiversity section) including areas such as the Bonny Upwelling. Include information on marine fish and especially nationally endangered species such as the White Shark. If these are not going to be included in the marine section, then incorporate these into the biodiversity section.
- Section 4.3.6, Page 116: The plan states that 'seagrasses are particularly vulnerable to the discharge of excess surface water into the ocean'. The threat is actually from the nutrients, chemicals and sediment that the water carries, not the water itself.
- Section 4.3.6, Page 116: The Plan states that 'PIRSA Fisheries ensure that natural fish stocks are managed sustainably'; however, the latest (06/07) stock assessment for the southern rock lobster fishery states that 'continued exploitation of inshore stock at this [current] level might not be sustainable'. Given that 85% of the lobster catch is taken at <60m, the likely impacts on the fishery from climate change, and the importance of the fishery to the region, this is a major concern that needs to be explored in more detail in the plan. Based on the precautionary approach, the lobster fishery quota should be reduced immediately. Whilst the Board may not have direct input regarding fishing quotas, they should be including the full extent of the threats to the species in the plan and not downplaying the impacts of current practices.

- Section 4.3.6: The threat from increased aquaculture, tourism and petroleum exploration in the region should be detailed in this section. This is mentioned on page 113, but it should be included as a threat in this section in more detail.
- Section 4.4, Page 118: There is no mention of the impact of climate change upon the marine environment, only the impact on the coastal zone and fisheries. This is a major gap and needs to be addressed. This section should include the impact from ocean acidification upon shellfish (eg Rocklobsters); and the impact of sea level rise upon algal communities such as reduced sunlight from being under deeper water and therefore reduced growth, which has potential for major impacts on species that rely on algae for food and subsequently for those further up the marine food chain. Although not region-specific, there are some good references out there on marine climate change impacts¹.
- Section 4.4, Page 118: The plan states that 'saltmarsh and mangrove communities... may retreat inland ...' It should be mentioned here that in some cases, due to coastal development, there might not be space inland for them to retreat to. They will therefore be lost and this will affect species that use them for breeding, nursery areas and general habitat.
- Section 6: commend the scope, content and treatment of this important topic.
- Page 175: 'Values', first paragraph – add Lower South East rising springs have extremely high biodiversity and support many regionally or nationally listed species. 'Threats and risk' good acknowledgment of this issue, needs to appear in section 3 also as per above comments.

Part 2: Strategic Plan (10 year)

- Page 18: The simplified vision for the region could be better phrased. The vision does not cover the role of people or the need to consider future generations. Whilst the text below explains the vision (and it is good to have an explanation), the vision should be self-explanatory. Consider something like 'Community creating healthy landscapes for better living now and in the future'.
- Page 19: It is not made clear that these guiding principles are in addition to the State NRM principles. Include the State NRM principles in the text here and not just in the appendix as it is too awkward to flick between this section and the appendices all the time. It should also be noted that there is some overlap with these 'additional' guiding principles and those of the State NRM Plan (eg within ecological limits is already in the State plan, consideration of future generations is already in state plan and engendering community enthusiasm already in State plan. Hence some of these additional principles do not add anything new. Some of these additional principles are also unclear eg 'consolidation of resources'. Does this mean human resources? If so, the reference to 'best practice' doesn't make sense. This needs to be better phrased using commonly recognised terminology by community.
- Page 20: The goals include a comprehensive explanation of what they actually mean in practical terms. However, the goals don't appear to cover climate change adaptation, like the state NRM plan goals do. This should be included.

- Page 23, RCT C.1 and W.1: It would be appropriate to make these as ambitious as RCT B.1 and B.2 and change wording to 'improved' rather than 'maintained or improved'. If these targets are less ambitious due to the of baseline data that needs to be obtained first specify this more clearly.
- W.1 and W.2: Is there a conflict between supporting 'beneficial uses/ quantity of supply for economic purposes' and supporting water-dependent ecosystems? It may be useful to explain how the Board is planning to achieve these targets. Perhaps this just needs rewording, as it seems like the Board is hoping to improve water dependent ecosystems and not reduce groundwater extraction. If less than 10% of wetlands in the region are wet, and water levels, flow, or the number of refuges at key aquatic habitats in decline, this implies the resource is severely over-allocated with inadequate environmental water provisions.
- RCT B.1 and B.2: It is assumed that these RCTs encompass coastal and estuarine biodiversity, however this could be made more explicitly clear. Alternatively have these as separate RCTs. Also scope for restoration or enhancement of habitats and species (specific conservation actions) could strengthen overall biodiversity outcomes for wetlands (is touched on in A15 but could be expanded to other threats and catering for other native species requirements).
- RCT B.3: Ensure it is clear that this target includes ensuring currently secure species/ ecological communities do not become threatened (proactive NRM).
- RCT P.1, Page 31: This target mentions the need for a mix of policy tools and practices, but it may be worth mentioning some of these (eg the need for incentives to help landholders become more involved).
- MATs: There is a good balance of management, research and planning actions.
- MATs: Given that most MATs are not asset-specific, it is very difficult to gather an insight into the expenditure against assets and there is no reassurance that some assets will be given due consideration. There needs to be some assurance that coastal, estuarine and marine issues regarding threatened species, pests, community awareness and engagement will be incorporated into actions coming from these MATs, For example, MAT C.8 managing pests makes no mention of marine pests and does not regard RCT C.1 as relevant. Very few of the MATs mention links with RCT C.1 and there are only two specific coast, estuarine and marine targets.
- MAT A.3, Page 37: Gaps in the understanding of the region's coast and marine habitats are identified and priority actions developed by 2015. It appears as though no practical actions or strategies are going to occur before 2015 until the priorities are identified. Many issues are already known, as described in the regional description, and some action could occur in the meantime.
- MAT D.10, Page 55: It should be noted that the outer boundaries of the Marine Parks have already been established – it's the zoning that now needs to happen. There is nothing in the plan regarding how, or in fact whether, the NRM Board will engage with this process and/or support its community to do so.

- MAT A3, Page 37: Land-based impacts upon the marine environment are mentioned in this MAT, however more could be specified about catchment to coast connectivity in the regional description.
- MAT B3, Page 43: commended
- MAT B1 and B2, Page 42: It may be worth specifying how increased participation will be measure (eg surveys etc...).
- MAT B5, Page 43: From the text, it is obvious this MAT involves the broader community; however, it may be worth changing the word agencies in the MAT. This is just semantics, but this gives the impression the Community Engagement Plan is just for government agencies. Engagement is a two-way thing, not just agencies to the general public.
- MATs C.2, A.5, A.9: The community will want to know what species and areas will be prioritised. If these are to be determined later, then state in the plan that there will be consultation on these matters and ensure that decisions are communicated to the community.
- MAT C.12, Page 49: Somewhere either here or in the regional description it should be mentioned that some perennials typically used for dryland salinity might pose a weed risk to the region (eg Perennial Veldt Grass, Tall Wheatgrass, *Acacia saligna* and *A. cyclops* all have high or very high weed risk ratings in the South East region ²). This MAT could be rectified by changing the wording to 'Board approved' or 'appropriate' perennial plants and then include those likely to be a weed risk in the regional description.
- MAT D5, Page 53: It is unclear how this MAT is different to a Water Allocation Plan (WAP)? This sounds like it covers all the things that the current WAPs should address. If this is for areas outside the current prescribed/ WAP areas, then this needs to be specified.
- MAT D8, Page 54: This MAT is commended and it is great to see an NRM Board taking a proactive approach to get ecological communities listed.
- Section 3.7, Page 57: The list of research opportunities is comprehensive and it is good to see that these are linked back to the MATs. Some of these appear to be integral to implementing the corresponding MAT (eg prioritisation process to identify 5 threatened species is required in order to implement MAT A.9); however, the plan seems to imply that the Board will only be looking for external funding for these research projects. Hence, it is not guaranteed that these research projects, required to implement some of the MATs, will go ahead. Surely, some of these research projects should be funded by the Board to ensure they do actually go ahead.
- Page 97: The links with other legislation, policies and plans are great. It may be helpful to include a flow chart to help explain this.

Part 3: Business Plan (3 year)

- It would be useful to include a division of the budget based on the different projects. By dividing the budget based on themes, it doesn't provide any indication of how much will be invested on weeds vs land vs biodiversity vs marine etc... Obviously, all these things overlap, but giving a figure for each project will provide greater insight into expenditure. As it is presented at the moment it is almost impossible to determine whether the investment in projects/ actions is proportionate to the regional priorities outlined in the state and condition report.
- Section 2.8, Page 27: It is great to see recognition of community groups as potential third-party delivery agents for projects. It may be beneficial to include a flow chart of staffing of the 38.6FTE for 10/11 to show the community what project officers will be on board that they can contact and what projects/ themes they will be helping community implement.
- Page 21 Table 1: There appears to be no mention of marine pest plants and aquatic pest fauna (eg fish such as Carp and Gambusia). If the Board does not cover these, explain why. At least include these risks in the regional description if not in the policy section.

Part 4: NRM Policy

- Page 50: It is good to see an inclusion of a forestry set-back distance. However, why does this only cover key wetlands and what is the definition of 'key' in this instance. Watercourses could also be included in this. Explain here why this doesn't apply to the Tintinara Coonapllyn PWA. This should not be assumed community knowledge.
- Page 52: Good definition of commercial forestry vs farm forestry.
- Section 6, page 70: Perhaps expand on the Board's role with these legislations and policies (eg the Board's role in the Native Vegetation Act).
- Section 7, page 73: The monitoring section is very vague. It provides a broad framework and states methods will be developed later. Perhaps expand this a little as the Board will have some idea what monitoring it will do. Will community monitoring be part of the program? How will the Board measure the success of its internal operations? Will information collected from monitoring be open to the public? If so how?

References

¹ Hobday AJ, Okey TA, Poloczanska ES, Kunz TJ, Richardson AJ (eds) 2006 *Impacts of climate change on Australian marine life: Report to the Australian Greenhouse Office*. Canberra, Australia

² Virtue JG and Melland RL (2003) *The environmental weed risk of revegetation and forestry plants*. DWLBC, Adelaide

Hammer M, Wedderburn S, van Weenan J (2009) Action Plan for South Australian Freshwater Fishes. Native Fish Australia (SA) Inc., Adelaide

McInnes KL, Suppiah R, Whetton PH, Hennessy KJ, Jones RN (2003) Climate change in South Australia. Report on: assessment of climate change, impacts and possible adaptation strategies relevant to South Australia. Undertaken for the South Australian Government by the Climate Impact Group, CSIRO Atmospheric Research, Aspendale, Victoria

Appendix 1. Threatened freshwater fishes of SESA and state conservation status after the 2009 Action Plan

Species	Scientific name	Status
Australian mudfish	<i>Neochanna cleaveri</i>	CR
Variegated pygmy perch	<i>Nannoperca variegata</i>	CR
Yarra pygmy perch	<i>Nannoperca obscura</i>	CR
Spotted galaxias	<i>Galaxias truttaceus</i>	EN
Estuary perch	<i>Macquaria colonorum</i>	EN
River blackfish	<i>Gadopsis marmoratus</i>	EN
Southern pygmy perch	<i>Nannoperca australis</i>	EN
Pouched lamprey	<i>Geotria australis</i>	EN
Shortheaded lamprey	<i>Mordacia mordax</i>	EN
Australian grayling	<i>Prototroctes maraena</i>	EN
Dwarf galaxias	<i>Galaxiella pusilla</i>	VU
Mountain galaxias	<i>Galaxias olidus</i>	VU
Congolli	<i>Pseudaphritis urvillii</i>	VU
Shortfinned eel	<i>Anguilla australis</i>	RA
Climbing galaxias	<i>Galaxias brevipinnis</i>	RA