

**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

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By email to: meristrategy@nrm.gov.au

Draft MERI Strategy for Caring for our Country

The Conservation Council of South Australia Inc (CCSA) is the peak conservation body for South Australia, representing over 55 of the state's environment and conservation organisations. CCSA is an independent non-profit, non party-political, community based organisation which provides resources, advice and representation for the SA environment movement, and which leads many of the key conservation campaigns in SA.

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

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

CCSA welcomes the opportunity to make comment to the Australian Government Land and Coasts Division on the Draft Strategy (Version 2) for Monitoring, Evaluation, Reporting and Improvement (MERI) of Caring for our Country on behalf of its member groups. CCSA commends the Australian Government on providing leadership on the development of this Draft MERI Strategy which is a considerable improvement on previous MERI strategies and processes.

However, the short timeframe between a call for submissions and the closing date of ten working days has prevented CCSA from being able to organise consultation with its member groups. The limited timeframe for public consultation has meant that little feedback has been provided from the non-government sector. We would however like to acknowledge the input of the Threatened Species Network (SEMW) to this submission. Given the importance of this Strategy for the Australian Government, State Governments, regional NRM bodies, the NGO sector and other stakeholders the limited feedback that is the result of the short timeframe is disappointing.

Given the limited consultation period, CCSA would like to have the opportunity to comment on the next iteration of this Strategy and to also see how other stakeholders have responded to this version thereby ensuring a more transparent process.

This submission first provides comment on a range of fundamental principles that should inform the development of the MERI Strategy and then provides general comments relating to the two parts.

Promoting the value of MERI and adaptive management to proponents should be a key rationale behind this Draft MERI Strategy and would contribute towards the development of a culture of solid monitoring and evaluation and adaptive management. In order to promote this culture adequate support must be made available at a range of levels. It is noted that this Strategy does not identify MERI Implementation support for proponents. A range of NGOs throughout the State will need support to work through both the MERI framework and program logic.

There is also a need at a higher level for investment in a national framework of indicators for matters of national significance based on the best available national science. This approach is vital to receiving the meaningful and consistent data required to establish a national picture.

General Comments on the Draft MERI Strategy

It is acknowledged that there are gaps in the draft Strategy including the provision of reporting guides and templates. CCSA trusts that there will be a consultation process developed around the design of the templates to ensure the best outcome for all stakeholders. There has been a great deal of learning from community groups about how to get the most out of reporting processes. Simple, uncomplicated reporting is best and it is important that this learning is not lost for smaller projects in particular.

The Australian Government promotion of an indicative allocation of a 10% budget for monitoring and evaluation has in-principle support from CCSA particularly as it promotes an adaptive management approach, however it must be treated as indicative only as all projects will need to decide their actual allocation on a case by case basis. .

Structure, Readability and Clarity

The document as it stands is difficult to access at different levels. The majority of CCSA member groups would be reporting on small to medium-sized projects, and has concerns therefore that the document be as accessible as possible. Onerous application and reporting processes can prove to be a disincentive for community groups to apply for funding in the first place. It is important to be realistic about the level of reporting that will be required for smaller projects. Many CCSA member groups have limited access to administrative support and the complex forms can therefore become a disincentive to engagement.

Similarly, CCSA is supportive of a roadmap or simple step-by-step summary of the Strategy. A generic summary at the beginning which informed project proponents which sections are applicable to their projects would be useful, as would the provision of worked examples of well crafted MERI plans at each level of project.

Federal, State and Regional MERI Frameworks

CCSA sees value in the provision of an explanation as to how these guidelines tie in with State and regional MERI frameworks. Clarifying the level of consistency between these guidelines and other obligations enables community groups to understand that there is limited duplication of effort required and to pin point where discrepancies may require consideration in design. In principle CCSA believes that maximum compatibility and consistency should be sought between national, state and regional frameworks wherever possible to provide best value for money.

Reporting

The South Australian government is working towards the adoption of *Interplan* software to store and report on governance and project progress. At set up stage there is an excellent opportunity to maximise compatibility through early and ongoing discussions between the Federal and State Governments and therefore minimise reporting demands for proponents.

In order to maximise opportunities for the availability of the data collected, where the information goes, how it is stored and how accessible it will be, should be part of the strategy. There must be provision for some publicly accessed data.

Reporting requirements need to be commensurate with the scale of the project in terms of investment as well as maintaining flexibility with indicators. Proponents must be clear on their reporting responsibilities at the point of contract so they can adequately plan to resource this.

Intermediate Outcomes

The Strategy proposes there be a revised set of standard immediate outcomes and outputs to be used at all project scales. Accommodation will have to be made for those proponents that are retrofitting outcomes to projects from the 2009/10 round of funding as this may impact on milestones.

As well there needs to be more of a qualitative component in reporting on intermediate outcomes to ensure learnings are captured and the process of reporting is useful to the proponents. CCSA member groups often collect a great deal of learnings and there must be scope for reporting against less tangible outcomes such as community processes.

Resource Condition Outcomes

Most CCSA constituents are involved in projects that have longer term outcomes, such as increasing biodiversity and community capacity, for which 5-year outcomes are inadequate. The national framework for indicators will need to give this some consideration. In addition there is merit in future business plans considering scope to fund longer term monitoring for ecological and social outcomes.

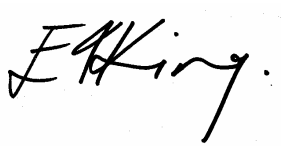
Supporting Community

In closing CCSA would also like to highlight that community will want to succeed in delivering their projects under CfOC. Therefore it is vitally important to set up this national framework with adequate support that maximising their chances to succeed, which will have benefits to all Australians.

It is important to note that our understanding of indicators is improving all the time and our MERI Plans will need to be flexible enough to be able to incorporate this increased knowledge and perhaps necessary changes within project periods.

CCSA appreciates having the opportunity to respond and trusts these comments will be helpful and duly considered.

Yours sincerely,

A handwritten signature in black ink that reads "Libby King". The signature is written in a cursive, flowing style.

Libby King
Program Manager