



**Conservation Council  
of South Australia Inc**

**Response to the  
SA Arid 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 SA Arid Lands 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.

More could be mentioned in relation to Section [75] [3] [d] that requires "working with, or engaging, councils or council subsidiaries, or other bodies or groups (including community groups and volunteers)". Little attention is made to community groups and none concerning volunteers. There are a number of volunteer groups operating within the SAAL and some reference should be made to these as well as an explanation of how the Board intends to work and support such groups. The draft Plan fails to clearly state the role of the broader community in NRM and implementation of the plan, other than to say it has a core role.

Section [75] [3] [1] [ii] on the state, condition and trend of resources could have been more comprehensive (see specific comments below relating to information on mining impacts, mound springs etc...).

### Cross regional issues and implementation

Cross regional issues are given little consideration in this draft plan and the issues and programs overlapping regional boundaries are inadequately described. For example, one of the primary considerations in the SAAL NRM region is the GAB and there appears to be no mention

Volume 1, Page 1 states that the GAB and surface water catchments such as the Cooper and Diamantina systems are national in scale, which adds an 'extra dimension to NRM planning in the region'. This however, is not explored further in the text. There is mention of the GAB Coordinating Committee but no mention of how the Board intends to work collaboratively with this group or with other states to manage the asset.

Likewise, there are rivers running into Lake Eyre with potential for erosion, siltation and so forth upstream and yet no mention of cross boundary implications or even what region these systems are in. A map overlaying catchments/ groundwater basins plus regional NRM boundaries in SA and interstate may prove useful for this purpose. There also appears to be no mention of cross regional programs or plans to collaborate interstate?

### Deficiencies in the NRM Act which affect this Plan

The implications of the mining legislation and inadequacies for the NRM Act and NRM Boards to implement change in these areas, becomes very apparent in this NRM Plan. Legislation such as the SA Roxby Downs Indenture Ratification Act (1982) has implications for NRM Planning as it effectively exempts the operations from state Aboriginal Heritage and Environmental & NRM legislation as well as vetoing power of releasing information to the public.

This NRM Plan should mention such issues. Any NRM issues related to mining have almost been completely excluded from the draft Plan. Even if the Board cannot affect operations, the issues should be made clear so that the relevant industries are aware of NRM issues relevant to their operations.

## **Specific Comments**

### **Community engagement**

#### Genuine community consultation

- The 14-week consultation period on the plan is commended and compensated for the submission process occurring over the summer period.
- The Board is to be commended on holding a range of meetings throughout the region as well as an Adelaide-based meeting, which allowed a broader range of people to be engaged.
- In the plan and summary sheet, there was emphasis on this being a community plan and stating that input will be genuinely considered. However, some of the content (see specific comments) and the style of writing did not necessarily support this statement. In order to be a community plan information should be included on the community's role in decision making and implementation.

#### 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 draft plan's structure and the sequential progression of information was clear and logical.
- An easily accessible page of acronyms is required. Whilst acronyms are explained the first time they are used, many people may flip straight to certain sections of the document and thus will not view the expanded version of an acronym.
- Generally, the language used in the draft Plan appears to be targeted to an NRM audience rather than a community audience. There is some NRM terminology and jargon that is inadequately explained. A glossary is vital and may assist in this area if the wording is not going to be altered. Other areas that can be addressed to improve readability include using simple verbs and ensuring compound and complex sentences are correctly punctuated.
- Inclusion of some case studies may assist in helping to convey messages to community regarding what sorts of actions the Board is hoping to achieve.
- Although it is recognised this is a draft, there are a substantial number of grammatical errors throughout the document and the summary sheet (eg errors of agreement, punctuation errors, tense confusion, switching between impersonal, first and second person, inconsistent dot point formatting, inconsistent use of capitals for common names, species names not included or not in italics, inconsistent use of hyphenations and some general typographical errors). At times, this has made the document difficult to read. The final draft will require a more thorough editing process.
- The maps included in the NRM Plan are almost illegible in the PDF format available on the website. It is assumed this was exported as a low resolution PDF so that it didn't take up much space on the website, however it doesn't prove useful for community if they want to see the maps. The final version needs to be in high resolution or there needs to be adequate opportunities for people to access high-resolution maps from the NRM Board.

- The inclusion of references upfront of each chapter is good. Some of this information sounds like it is directly extracted from the documents, which is evident from the change in writing style and formatting from section to section.
- It doesn't appear as if much information has been sourced from sources external to state government agencies. Expanding the information source upon which the draft Plan is based may increase the comprehensiveness of the information.

#### 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

- It would be helpful if documents referred to in the text of this plan include citations or weblinks for easy reference.
- Summary sheet: The summary sheet included with the Draft Regional NRM Plan is useful and covered the important aspects.
- Feedback form: The feedback form is relatively useful. This feedback provides direction for community by asking specific questions on each volume and has adequately described how feedback will be considered.

#### **Volume 1: Part 1 Setting the scene**

- It is good to show the NRM regional and group boundaries upfront in the plan.
- Page 1: The introduction clearly delineates the links with the NRM Act and obligatory aspects of the Plan as per the NRM Act and what natural resources are covered by the Act and hence this Plan. The introduction lacks a definition of natural resource management, which is important to facilitate community understanding.
- Page 4: Under shared management also include the broader community.
- Page 6: The overarching goals listed should include a phrase regarding the region's ecological systems being adaptive to climate change.
- It would be useful to include information or a flow diagram showing how the regional plan relates to other plans (eg the State NRM Plan, other regional plans, the Water Allocation Plan being prepared etc...). Comments could also be included on other biodiversity policies such as Nature Links etc...

## **Volume 1: Part 2 State of the SA Arid Lands NRM Region**

- Page 11: The links between natural resource assets and climate is well explained. It may also be useful to include the human role and linkages here eg the human reliance upon and impact upon natural assets.
- Page 30: The draft Plan has described the various community sectors and groups and their involvement in NRM activities, but has failed to include their role in NRM decision making. This listing of partners is not comprehensive and should either be expanded to include special interest groups that operate in the region, tertiary and research institutes, or otherwise it should state that this list is not comprehensive.
- Page 31: In the key risk factors relating to cultural and social issues, it might be worth expanding upon any issues arising from the shift from family holdings to corporate ownership, such as loss of knowledge and experience from the region.
- Page 41: The comparison of grazing pressure between herbivores is good, however it is simplified, and more complex than how much herbivores consume. It may be worth including text regarding trampling effects, the height at which animals graze (eg pulling out whole plants vs ringbarking vs nipping off tops), species preferences etc... The analysis, at present, might be perceived by community as reflective of the impact of herbivores upon vegetation cover. Also the number of watering points is vital, not just the positioning.
- Page 45: It would be useful to include some more information on Corbid and Wedge-tail eagle predation of lambs as this is a very large myth in regional communities and the draft Plan should act to abate these myths. Many studies have been conducted that show that predation is negligible and is usually the result of predation upon starving lambs that will die regardless of the birds or scavenging upon lamb carcasses.
- Page 47: There is some incorrect use of terminology such as 'woody weeds' which do not refer specifically to increaser native perennials but also exotic woody weeds.
- Section 6.2.1, page 56: The comparison of GAB daily water use between mining, domestic and pastoral is good to include, but is a little unclear. Is this water usage across the whole of the GAB or just GAB extraction in the SAAL region? Information here specifies 33ML/day is required for pastoralism, but it is unclear whether this figure is actual usage or the amount needed/ required for operations. The wording of this sentence may just need to be adjusted. The information provides statistics for mining operations at Moomba, Olympic Dam and Roxby Downs, but does not provide any information for GAB water use in other mining operations in the region. This subsequently provides a biased comparison between pastoralism and mining GAB water use. If this information is not available, this needs to be stated in the plan and noted as an issue to address natural resource management planning in the region.
- Section 6.2.1, page 57: Other than salinity pollution due to changes in aquifer pressure, there is no mention of other pollutants to aquifers eg potential for contamination through mine tailings.
- Section 6.2.1, page 57: The draft Plan states issues related to pastoralism water use, but not those of mining, nor how this can be managed. It is understood the NRM Act

has little influence on mining operations, but threat should be mentioned in the state of the region report regardless of the limitations. Even if the Board cannot act upon the issues, the mining company should know what the issues are in relation to NRM so they can act responsibly.

- Section 6.2.1, page 57: Include link to the GAB WAP or a reference.
- Section 6.2.1, page 57: The information on the impact of grazing pressure upon mound springs is very limited. Include more information (there is plenty of research that has been done).
- Include more information on the impacts of tourism upon natural resources in the region. This is a growing threat, especially in the Flinders/ Olary ranges and mound springs require more attention.
- Section 6.2.1: The draft Plan states that GAB water use is unsustainable but provides no advice on management.
- Section 6.2.2, page 59: There is mention of the Mambray Coast Basin, and in sections like this it should be mentioned that they cross over regional boundaries as this has implication for NRM planning and management.
- Section 6.2.2 page 64: There is mention of pollutants for surface water, but besides effluent, there are no examples and little attention to impacts.
- Section 6.2.2: Here, and throughout the rest of the document, common names of fauna are inconsistently formatted. Within one paragraph, some common names have capitals, whilst others do not.
- Section 6.3.1, page 68: Include a reference (and where they can be obtained) to the 6 biodiversity strategies or include a link to the reference list and put the strategies in the reference list.
- Section 6.3.1, page 74: Include a definition of 'braided streams'. There is no explanation in the text or at the very least include in a glossary. This may not be a term the broader community are familiar with.
- Section 6.3.1, page 76, Table 5: Did the plan mean Pernatty Knob-tail (not Pernalty Knob-tail)? Also, include the scientific name (*Nephrurus deleani*) here, as this is not included elsewhere. It looks like this has been extracted directly from the Biodiversity Strategy without rewording or editing and the typographical error carried over.
- Section 6.3.2, page 81: There is very little information on altered fire regimes here and the impact upon germination and recruitment, something of particular significance in the SAAL region.
- Section 6.3.2, Table 8, page 83: There are inconsistencies with formatting of common names and species names in this table. Some species names are not in italics, some common names are capitalised for both parts of the name and some have a capital for just the first word, some species names are in brackets and some are not.

- Section 6.3.2, Table 8, page 83: This table lacks detail and is quite confusing. The name of the table implies this covers threatened species as well as endemic species. However, it is unclear which species are endemic and many are not listed (eg endemic snails). There is also no reference to what the conservation ratings are for these threatened communities and species and this would be useful to include.
- Figure 19, Page 69: Ensure the map of the bioregions matches the names you have used in the text so that community can work out where these species and ecological communities occur.
- Although climate change is mentioned, there is little attention given to how the Board plans to address ecosystem resilience to climate change, nor does there appear to be many actions associated with this.
- The State of the Region report does not clearly spell out the knowledge gaps in the region and it may be useful to include a separate section in Part 2 to look at this.

### **Volume 1: Part 3 Ten Year Strategic Plan for the SA Arid Lands NRM Region**

- Section 2.2, Page 91: There is a good explanation of the RCTs and the rationale behind whether they are specific or general. The explanation of the targets is comprehensive.
- RCT 2: It is unclear whether risk categories are related to conservation status through the EPBC. This requires further explanation as it is not a commonly used term by community (use the standard terminology). Does RCT 2 include no species becoming threatened when they are currently secure, if so this needs to be made clearer, if not then this should be a specific target.
- RCT 7: This should just be improved, rather than improved and maintained. Many of the targets are merely suggesting things be maintained. These targets lack ambition. Many other regions have developed more ambitious targets.
- RCT 8: It is unclear what measures of water quality will be used. The only thing mentioned in the state of the region report was salinity due to pressure changes in the GAB. Is this the only water quality issue? This needs to be specific.
- Section 3.1.1, page 98: There is a lot of information explaining the MATs, however in some instances these are at a very broad/ overarching level and it is not clear what the action or strategy will actually involve.
- Page 105: RCT 3 needs a MAT to educate mining companies and state government of their adverse impacts and the methods for reducing water extraction. It would also be beneficial to have a MAT regarding advocating for the provision of more information from the mining sector to assist in water resource management.
- Section 4.1, page 123: The monitoring section very detailed and specific. There does however seem to be little reference to community monitoring and the monitoring mentioned is mostly government based.

- Section 5, page 130: The summary of the MATs is useful.
- In the MAT partners/ lead agencies, change universities to Tertiary Institutions so this is more inclusive.
- MAT 3: How does the Board intend to measure the level of biodiversity input?
- MAT 28: Would be more beneficial to measure the activity of those involved in the Lake Eyre Basin rather than just broadly acknowledging their respective roles.
- MAT 29: Suggest adding 'Prioritise and' to 'Implement protection...'
- MAT 31: Suggest adding 'Ensure that high research priorities are being 'identified' and being addressed...'
- MAT 44: How does the Board intend to measure 'accessibility'?
- MAT 45: It is not believed that this MAT is appropriate. It should be noted that the South Australian Curriculum Standards and Accountability framework (SACSA) is very different from traditional prescriptive curricula that state what must be taught and when. The SACSA framework is an outcomes-based framework stating what students should have learnt, achieved and experienced at the end of every two years of their school life from birth to year 10 (SACE takes over for years 11-12). This means that if a teachers has a particular interest in, for example, the marine environment, they could use this as a 'theme' to hang off the SACSA framework to achieve these learning outcomes, using the sea as a topic to teach maths, science, English, technology, SOSE, arts, physical education and more. Similarly, the use of environmental education to teach about natural resource management, could be used to teach all topics within the SACSA framework if a teacher had the interest. In addition, in the Society and Environment (SOSE) learning area there is a 'strand' called 'Place, space and environment', which has learning outcomes focussed on the following three 'key ideas' (these are from the Primary Years section):
  1. Students examine natural and social environments in local and global communities, analysing patterns, systems and relationships
  2. Students use a range of resources and technologies to gather and present information. They develop mapping and graphing skills to represent observable features in the environment
  3. Students consider sustainability and care of resources and places as they explore how people's attitudes and values affect their interactions with natural features and cycles

From further reading of the detail of the SACSA framework it is quite clear that teachers are required to teach about ecological sustainability, interconnections, interactions and interdependence of people and the natural environment, and students should be given the opportunity to learn geographical skills from the field.

In the Science learning area, the 'Life Systems' strand also incorporates elements of learning about living things, their diversity, their internal and external features, reproduction, growth and the importance of maintaining biodiversity.

A further objection to this MAT is that it is inappropriate for this action to be undertaken by one NRM Board. If the Board feels strongly about this MAT, then we recommend that it be pursued by the NRM Council with the co-operation of the Department for Education and Children's Services, because it means addressing and potentially changing the entire State curriculum framework, which in its current form is more than adequate for use in teaching natural resource management.

- The balance of actions/ MATs to address regional priorities is adequate; however, there is a lack of actions for on-ground implementation. Most actions focus around research, risk assessment, planning, identifying priorities and technical support. Besides MATs 29 and 35 there do not appear to be any on-ground works and there appear to be no on ground projects mentioned for biodiversity. Based on the information presented in the state of the region report there is adequate information to start implementing actions. For example, MAT 23 and 24 are about planning to manage bores, but investment should also be made of continuing to cap these to ensure community momentum is maintained. Likewise, an action to implement biodiversity on-ground works is warranted and could include funding for mobile watering points or additional watering points to reduce total stock grazing pressure etc... A balance of policy tools is required to affect community behavioural change. Education alone is inadequate.
- Landholders, broader community, NGOs, volunteer groups etc... seem to have been bundled up into the general partner of 'community' and these sectors of the community are all very different. It would be good to specify specific partners and not bundle them all together. Industry groups also seem to be given little attention with regard to their role as prospective partners/ delivery agents for these actions.

#### **Volume 1: Part 4 The Regulations and policies to help us**

- Section 5, page 130: Here we get the first introduction of the definition of natural resource management. This should be presented upfront in the plan. There are some minor issues with structuring and sequential presentation of information throughout document.
- Page 141: Whilst the regulatory section's content is good, it is not written in a community-orientated style and almost reads as if it has been extracted straight from the Act. Some effort to rewrite in a community friendly and meaningful style may be of assistance to genuinely make this a 'community' plan.
- Section 4.7: There are major issues and inconsistencies with formatting dot points here.

#### **Volume 2: Business Plan 2010/11 to 2012/13**

- Page 3: There is a good definition of NRM Group roles and backgrounds here.
- Page 7: It may be beneficial to link Table 1 to the MATs as the linkages are unclear between MATs/ Program Areas and the Projects listed here.

- Page 8: The draft Plan states that the 'Board will fund other organisations/ individuals to deliver some of the Board actions'. This is good as it shows the Board is not 'empire-building' and planning to develop genuine partnerships. However, there is no further information in relation to this eg is this in relation to delivery of on-ground work projects, will other community groups be able to deliver components of certain projects? This is not shown in the major delivery partners of Table 2.
- Page 12: The draft Plan states that it will not increase the water levy beyond CPI increases, as a result of discussions with the mining/ energy sector. This whole section lacks public transparency. Why were such decisions made? The other NRM levy increases are justified and explained whereas there is no rationale provided for this decision not to increase levies. Based on the information provided in the State of the Region report, water management is a key issue in the region and levy increases should reflect regional issues and the areas where investments are to be made.
- Page 12: There is a concern regarding how mining/ energy will fund projects in partnership with the Board. This must occur with the upmost public transparency. It would be appropriate to include in the draft Plan the areas in which these sectors are expected to invest. This is not shown in Table 3 of investment sources and it is not known whether this investment will even benefit regional priorities.
- Appendix 3: It may be useful to link staff to program areas/ MATs to demonstrate why they are necessary and help community know the relevant contact point for issues in which they have an interested.
- The distribution of funding across program areas is generally supported and appears to match the regional priorities set out in the state of the region report.
- It would be beneficial to include an analysis of the proposed expenditure divided to show how much will be spent on admin vs. education vs. on ground works vs. landholder incentives vs. salaries etc...