



**Conservation Council
of South Australia Inc**

**Response to the
Kangaroo Island Regional
Draft Natural Regional
Management Plan**

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Introduction

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 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.

CCSA 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). CCSA 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.

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

CCSA is committed to a healthy environment for South Australia.

CCSA's submission

CCSA is pleased to make a submission on this Draft NRM Plan and commends the Kangaroo Island NRM Board's efforts. This submission contains comments provided to us by representatives from CCSA member groups on Kangaroo Island, CCSA staff as well by the Threatened Species Network (TSN). CCSA would like to see all the groups that have contributed to this submission acknowledged and receive future correspondence on the Plan.

This submission provides general comments on the Plan as well as specific comments in relation to the 5 volumes. CCSA 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.

The KI NRM Board is to be commended the consultation process for the draft NRM Plan. During the consultation process it became clear that two of the principal concerns raised related to water resource management and forestry. Recognising the affects of forestry on water resources has been a significant outcome for the regional community through the consultation process. It is also very apparent, through

consultation on the Plan, that the broader community expects the issue of forestry as a water affecting activity to be recognised and appropriately managed.

CCSA commends the KI NRM Board for tackling the contentious and critical issue of the management of water resources and water use on the Island, given that the Water Resources Act has not been applied to KI before. Similarly CCSA is supportive of the Board in determining the importance of controlling certain water affecting activities and implementing a range of water-affecting activity policies. Upon review of this Plan, revisiting the issue of particular catchments on KI that warrant prescription will be important and, in particular, the Middle River catchment in order to protect the town water supplies. CCSA is also supportive of the 25% SUL, as a general rule, when there is minimal information available regarding the particular water resources in question. The necessary improvements beyond this general rule would come from Prescription, Water Allocation Planning and associated processes such as regulation of WAA, water licensing and water permits under the Act.

CCSA strongly supports the Boards' desire to appropriately manage impacts of commercial forestry on the water resources of KI (and across the State) given the impacts and risks are clearly articulated in the KI State of the Region volume (2009). Feedback that CCSA received from community consultation on this issue was that the Board was considering forestry as a WAA and then developing guidelines. CCSA is disappointed that this has not translated in the draft Plan given the importance of equity across water users on the Island. Further comments on these issues are under the relevant volumes.

General Comments

Alignment with NRM Act, State Plan and environmental legislation

CCSA's believes the Draft NRM Plan is generally consistent with the NRM Act, State NRM Plan and other environmental legislation.

Cross regional issues and implementation

Cross regional issues have been given very little if any consideration in this document, in particular how Gulf St Vincent will be managed in conjunction with the AMLR and N&Y NRM Regions.

Deficiencies in the NRM Act which affect this Plan

There are a number of deficiencies in the NRM Act in relation to forestry and farm dams influence on water resources, which the KI NRM Plan has brought up and CCSA has provided comment on below.

Principles

The KI NRM Plan has not articulated any overarching principles that will guide decision making for investment. Principles are needed as a base to inform decision making, particularly to help work through and manage challenges. Having articulated principles also informs the community as to what the Board stands for.

Specific Comments

Community engagement

Genuine community consultation

- The NRM Plan's release has coincided with a number of other NRM Plans which many peak bodies and other statewide organisations are also commenting on. The extended public consultation period beyond the statutory 2 month requirement is therefore welcomed and encouraged for other plans released during peak farming times or when other documents are also in the public arena for comment.
- The provision of both hard and electronic copies for those who do not have access to electronic media, is strongly supported, however charging for the hard copy documents may have excluded some community members from making comments.
- CCSA acknowledges the efforts of the KI NRM Board to engage with and consult the community during the NRM planning process over the last two years. In particular, the 'shared vision' workshop is to be applauded for ensuring that the agreed vision for KI was adopted by a range of Peak organisations, including the NRM Board. Given the importance of this unique consultation strategy there is an opportunity, in the Plan, for the Board to showcase this in greater detail. The Board is also to be commended for their engagement efforts during the formal consultation period, with the holding of information sessions first and then public meetings some weeks later to enable a much more informed community. As well, providing the option of two meeting times in the same day, for interested parties was beneficial, as was holding Adelaide-based meetings.

CCSA would like to see all regions demonstrate genuine community consultation and engagement throughout all stages of NRM Plan development and recommends that consultation occur through every stage of the planning process and continual requests for input be sought (not just from Board selected technical advisors but whole of community) to ensure it is a real 'community driven plan'.

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 intergenerational equity exhibited through the innovative title of the Plan is to be commended
- The use of informal language in the Plan is a welcome relief compared with other documents laden with bureaucratic information and jargon. The down to earth style and tone will possibly make the document more accessible to community.
- Whilst the plan is short and succinct which is great for the general community and means more people are likely to read the document, there are a number of gaps in the text and information which should be fleshed out further (as discussed below).
- A glossary would be useful in helping to explain some of the NRM terminology used throughout the document. There is a glossary included in volume 3, but the glossary

should be placed at the end of each volume. There are a number of NRM terms which are not adequately explained, for example ESD is referred to on a number of occasions but there does not appear to be a meaningful definition. It would be helpful if this and other terms were included in the glossary.

- There are a number of acronyms used throughout this document. Some of these are referred to in full only once and it is quite difficult to locate what they stand for. A list of acronyms used in each volume would be beneficial in facilitating the communities understanding of these terms.

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. In that vein the Plan presents an opportunity for the Board to showcase

- There does not appear to be any information or description on what natural resources are, what NRM is or the function of the Board. It would also be helpful to include information on how the NRM Plan can be utilised by the community.
- Given the importance of partnerships to more effective NRM there is limited recognition of NGO's and volunteers in the whole Plan.

Volume 1: State of the Region 2009

- Page 5: The intrinsic environmental values of KI are understated in the Plan. Given the fact that the Island has these tremendous environmental assets they could be given greater emphasis in the Plan as a significant point of difference from other regions.
- Page 9: Although the SOR report is strong on Indigenous cultural assets it is not clear throughout the Plan how Indigenous communities with a continuous interest in NRM will be engaged with the Plan.
- Page 9, paragraph 3: The reference provided here (Tyler et al 1998) is not contained in the reference list.
- Page 24: It is positive to see examples and information taken from external plans (eg KI Biosecurity Strategy Project) and presented in the core of the NRM Plan so that people do not have to keep cross referencing to other plans. The insertion of weblinks for more information is also helpful.
- Page 24: It is unclear whether the risk assessment framework used considers the potential impacts upon ecosystems or agricultural systems.
- Page 24 – 27: Are other pests such as Mundulla Yellows also a risk to the island and worth mentioning in this section?
- Page 24 – 27: It is great to see an explanation included in the bulk of the text of how priorities were determined.
- Page 24 – 27: It would be good to include information on how pest incursions to the region will be managed or monitored.
- Page 24 – 27: It would be appropriate to include information on pests already existing in the region and how these are currently being managed, what they have impacts upon etc...
- Page 29 - 50, Soils and landscapes: There does not appear to be any mention of current management initiatives for abating key threats. The monitoring and investigations mentioned in this section also lacks detail. It is stated that there is no need for additional resource descriptive information but there is no mention of knowledge gaps in relation to management of the resource.
- Page 29, Soils and landscapes: Ecological values of the soil and land resource could also be included as well as socioeconomic values.
- Page 66, Water resources and aquatic ecosystems: The section on threats would benefit from information on threats to groundwater eg are there many bores on the island and is groundwater over allocation also an issue?
- Page 66 – 68: There is very little information on the threats to aquatic biodiversity. The plan does not provide information on whether there are feral fish species of concern,

what the status of fish and other macroinvertebrates are, the impacts of pollution and sedimentation on stream biota etc...

- Page 68, Water resources and aquatic ecosystems: It is great to see mention made of cumulative impacts of surface and groundwater extraction through dams and forestry.
- Page 72, terrestrial ecosystems and biodiversity: The intrinsic value of biodiversity could be mentioned as well as other socioeconomic values other than tourism. Native vegetation for example can help stabilise soil, reduces salinity, attracts birds which predate on agricultural pest invertebrates etc...
- Page 74, Terrestrial ecosystems and biodiversity: The figure here is very difficult to read.
- Page 77, Terrestrial ecosystems and biodiversity: It may also be appropriate to mention native species that have become pests in this section such as Koalas.
- Page 78, Terrestrial ecosystems and biodiversity: The threats in this section are inadequately described. Information could be presented here on the nature of these threats and specific examples of how they have an impact.
- Page 79 - 86, Coastal estuarine and marine: There is lack of specific information on fishing such as the status of commercial fisheries (eg are the over-fished and at risk?) and the impacts of both commercial and recreational fishing upon the marine environment. Likewise it would be beneficial to include some information on what actions are required by the management authority (ie PIRSA Fisheries) to reduce fishing pressure where needed.
- Page 79 - 86, Coastal estuarine and marine: It would be appropriate to discuss specific information regarding the links between the regional plan and the Living Coast Strategy, Marine Planning Framework, Marine Parks process and the draft Estuaries Policy and Action Plan.
- Page 85, Coastal, estuarine and marine: It would be good to include explanations for the cause of seagrass loss along the coast
- Page 86, Coastal, estuarine and marine: As for biodiversity it would be beneficial to expand on information of threats with specific examples. For example under inappropriate disturbances it would be good to mention impacts on Hooded Plover and other nesting bird sites due to beach traffic. Another example is input of pollution and information could be provided that links the threat with the impact on marine biodiversity.
- A minor comment for this volume is that the footer is incorrectly labelled as the 'Strategic Plan 2009 – 2019' instead of the 'State of the Region'

Volume 2: Strategic Plan 2009 - 2019

- Page 9: Although not a requirement of the NRM Act, it would be useful to include a map of the links of NRM to other agencies, as this is something that causes confusion in the community.
- Page 11: The 'Shared Vision' for KI initiative with other peak organisations is to be commended.
- Page 12: The explanation of resilience is clear and written in community-orientated language which is commended.
- Page 13: The regional targets would benefit from being more quantitative (especially the strategies focused around land degradation are quite vague). There was also not enough information provided in the state of the region report in order to determine what the current level of degradation is. Many of the targets are based on a % increase from current levels, but the current levels are not quantified. It is very difficult from the information presented and this table to get an indication of how much the Board is aiming to achieve.
- Page 18: RT 2.1/2.2 Would be good to be more ambitious and aim to achieve 'Cooperative relationships....' In the short-term as opposed to a long term outcome given the importance of partnerships to managing natural resources. For example it is especially important to work with the urban community to reduce the demand on the public water supply given the pressure on the Middle River Reservoir.
- Page 18: RT 2.2 It would be good to identify the organisations relevant to NRM in the appendix (so they know who they are).
- Page 18: RT 2.3 Again would it not be better to aim, as a short-term outcome, for 'community, industry and agencies' to actively contribute to decision making that relates to NRM rather than the short-term outcome of those groups having 'opportunities to participate in NRM at various levels'.
- Page 18: RT 2.3, 2.4 From the state of the region report there did not appear to be any indication what the current levels of community engagement are or how this has been measured in the past or how it will be monitored in the future.
- Page 18: RT 2.4 It is not clear what 'personal time and resources less limiting' means in terms of the Strategy?
- Page 19: RT 2.6 Whilst this target is great it should be noted that knowledge can be acquired outside of formal education and this target should be more directed towards acquiring NRM knowledge. For example the proportion of island residents who have post-school qualifications may increase, but they may all undertake tertiary qualifications in forestry or development etc... which may not necessarily help contribute to the Board's goals and visions. Would suggest re-writing to be more specific or alternatively rewrite so it is focused on the proportion of Island residents undertaking education in NRM related fields, including Board delivered workshops and training days.

- Page 19: RT2.7 This target should be redirected in another way. It is unclear whether the Board has any influence over who has access to the internet and is the issue that the community does not have access to the internet or the communication from the Board is not meeting the communities needs? If information is not getting to the community it is possible the Board needs to change its communication methods, not that the community needs to change the way they receive communication.

Volume 3: Regulatory and Operational Framework

- This volume is to be commended. It is very comprehensive and the regulations are explained in a clear and concise manner, rather than merely cutting and pasting information directly from the NRM Act which some other Plans have seemed to have done.
- Page 9: It is good to see the duty of care mentioned upfront and emphasised. Most of the other text in this volume is explained in lay terms and it would be good to do the same for this section as well, rather than a repeat of essentially what is in the Act.
- Page 9: The link to the codes of practice the Board supports is great. It would be good to include a weblink or citation for these so that people can find more information on them.
- Page 14: The Board is to be commended on its response to the Kangaroo Island Development Plan. The key elements of the DPA supported by the KI Board would serve as the basis for an MOU with the KI Council.
- Page 15: It should be explained that it is the previous Soil Conservation Board (unless they are still in operation) to avoid confusion with SCBs and the NRM Board.
- Page 16: It is important to say that land capability may change as a result of climate change.
- Page 18: It is good to see examples of 'good risk management practices' (and the title is an improvement from 'best practice' as these have often been referred to in the past). These examples will act to educate the community on what they can and should be doing to manage natural resources. It would be useful to include a similar list of examples for other assets as well (either here or in the state of the region report).
- Page 23: It is great to see the impact of forestry and farm dams clearly explained including the influence of climate change and cumulative impacts. It would be helpful to include some specific information on the impacts upon water dependent ecosystems, surface and groundwater resources as this seems to be skimmed over in the state of the region report. This highlights the deficiencies in the NRM Act in considering these matters.
- Page 30: From the information provided here it is not clear whether any areas on KI are or are not planned for prescription or if activities requiring a permit are relevant to the whole of Board area.
- Page 31: CCSA agrees that the approach to commercial forestry in relation to water resources on KI is consistent with the National Water Initiative 2004 (NWI), South

Australia's Strategic Plan (2007), the State NRM Plan (2006) and Tackling Climate Change: South Australia's Greenhouse Strategy (2007-2020) and with the level of management currently occurring across South Australia. CCSA strongly supports the Boards' desire to appropriately manage impacts of commercial forestry on the water resources of KI given the impacts and risks are clear. In the South East commercial forestry is recognised as a Water Affecting Activity under the regional plan. In July 2007 the then Environment Minister required all new forestry projects to have a water license as this was seen as the only way to "provide clarity, certainty and sustainability for the industry and other water users in the Lower South East" (Minister Gago <http://www.ministers.sa.gov.au/news.php?id=1953>). In the Adelaide and Mount Lofty Ranges region commercial forestry has not yet been recognised as a Water Affecting Activity, however this has been recommended by the State Parliament Natural Resources Committee as a result of the Inquiry into water resources of the Deep Creek catchment (NRM Committee 2007). That same committee also put forward the same advice for KI (NRM Committee 2008). It is within the interests of the State Government to support the necessary management of water resources and the only effective way to do this is through recognising commercial forestry as the user it is, and regulating for that through the water affecting activity and licensing process.

- The inadequacies of the Development Act in dealing with cumulative impacts (an essential component to water management) is also strongly supported.
- Page 31, paragraph 7: The catchments for which a moratorium has been agreed, should be specified somewhere in this document.
- Page 59: It would be useful to point out whether 'sustainable use limits' are based on current or future climate scenarios and what other information they are based on.
- Page 67: It would be useful to educate the community to list the declared and controlled pests as an appendix.
- Page 74: it is great to include information on the Native Vegetation Act. It would be good to expand to explain the role of the Native Vegetation Council and what the Native Vegetation Act is about and how it relates to the NRM Act.
- Page 78 Appendix 1: The Board is to be commended on the inclusion and thorough response to development and planning issues in this Appendix.

Volume 4: Business Plan 2009 - 2012

- Page 8: The inclusion of a framework and criteria for determining broad investment properties is commended, but it does not really provide any explanation of why investments have been focused on certain areas, who was involved in the decision making process and what input community had.
- Page 11: The table listing the links between old and previous programs is helpful to those trying to work out how they fit into the scheme of things.
- Page 12: From reading the state of the region report it did not adequately come across that Pelican Lagoon (singled out for a specific action) was a coastal hotspot.

If so it should be spelt out why it is a priority and it is important to ensure the level of investment matches the objectives in relation to this area. Also there does not appear to be any actions relating to the rest of the coastline or is this covered under other biodiversity actions?

- Page 13 – 24: The table is useful in showing links between goals, programs, strategies and actions. For some actions it is unclear what the projects will actually entail, i.e. whether they are on-ground works, education or direct action. For example in the action 'manage the impacts of salinity on key biodiversity assets' it is unclear how it will be managed, if it is through a mix of policy devices then it should mention this. There also does not appear to be any incentives specifically mentioned in any of the actions, it is presumed they are included within actions, but the actions are described too vaguely to make this judgement.
- Page 15: Biosecurity - Important to work cross-regionally on bio-security issues.
- Page 15: Some resources have been identified to undertake a review of the status of KI species to identify new recovery actions however it is important to identify investment from the listed species already known to be a priority. For example the KI Dunnart, Southern Brown Bandicoot, Heath Mouse and the Western Whip Bird require ongoing investment (rather than in 3 years) particularly as a number of these species conservation efforts have momentum that can be built upon.
- Page 15: Also it is important to identify for investment nationally listed fauna.
- This would encourage future reviews of the Business Plan to identify investment in conservation of the Narrow-leaved Mallee should its nomination as a Threatened Ecological Community (TEC) under the EPBC Act be successful.
- Page 20: The action to work with council should specifically mention an action to work with them to amend the development plan given the extent of inconsistencies outlined in previous volumes this should be a priority action.
- Page 22: Strategy – 'Develop the capacity of primary industries to adapt to climate change' . Concern that the Actions 'Work with farmers to refine and trial...' and 'Support investigations into new sustainable economic development opportunities...' are subjected to good risk assessment procedures to ensure new problems are not being created. Also, given the low allocation for research funds it may be difficult to achieve some of these strategies.

Volume 5: Monitoring, evaluation, reporting, learning, and improving natural resource management

- There appears to be little investment set aside in the business plan for research of the knowledge gaps identified in this volume. It is important to allocate sufficient investment for research in order to leverage other research partners and funding sources. Information should be included how these will be funded and delivered.
- Page 16, table 3: Should community also be the audience for level 4 evaluation and be able to scrutinise the report on the Boards governance?

If any additional information is required or for clarification on any point please contact the following:

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References

Natural Resources Committee (2007) *Ninth report of the Natural Resources Committee*. Parliament of South Australia. Tabled in the House of Assembly Tuesday 19th June 2007.

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