



**Conservation Council  
of South Australia Inc**

**Response to the  
Eyre Peninsula Regional  
Draft Natural Regional  
Management Plan**

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# **Table of Contents**

<b>INTRODUCTION.....</b>	<b>4</b>
<b>GENERAL COMMENTS .....</b>	<b>5</b>
<b>Alignment with NRM Act, State Plan and environmental legislation .....</b>	<b>5</b>
<b>Cross regional issues and implementation.....</b>	<b>5</b>
<b>Deficiencies in the NRM Act which affect this Plan .....</b>	<b>5</b>
<b>SPECIFIC COMMENTS.....</b>	<b>5</b>
<b>Community engagement.....</b>	<b>5</b>
<b>Volume 1: State of our resources.....</b>	<b>7</b>
<b>Volume 2: Caring for our resources.....</b>	<b>11</b>
<b>Volume 3: Investing in our resources .....</b>	<b>12</b>
<b>Volume 4: Managing our resources.....</b>	<b>13</b>

## **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 Eyre Peninsula Natural Resource Management Board's efforts. This submission contains comments provided to us by representatives from CCSA member groups 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 4 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.

## **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

Any information on cross regional natural resource management issues, cross regional programs or potential for cross regional implementation seems to be absent in the plan. In particular, no mention seems to have been made in regard to the management of Gulf St Vincent in conjunction with the adjoining Northern and Yorke and Kangaroo Island NRM regional bodies. Another key cross-regional issue is that of Biosecurity which is not addressed. It would also be helpful to mention whether the Board has linked with adjoining NRM Boards to deliver Indigenous programs.

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

There is a lack of clarification on the community's legal obligation to protect terrestrial biodiversity. Part of this is due to the lack of guidelines in the NRM Act to provide guidance on the management and protection of natural resources as required under general statutory duty, but the NRM Plan could assist by at least mentioning the Native Vegetation Act and stating that land managers have a duty of care. Most importantly, NRM Boards, also have responsibility under the Native Vegetation Act.

## **Specific Comments**

### **Community engagement**

#### Genuine community consultation

- CCSA would like to see all regions demonstrate genuine community consultation and engagement throughout all stages of NRM Plan development. CCSA would have liked to see the EP NRM Board engage with all who had an interest in the region. There has been little attempt to consult with people outside the region such as rate payers, special interest groups, future residents who reside in Adelaide and so forth.

Whilst preliminary engagement with community occurs once the concept statement is drafted there appears to be little broader consultation on the planning process until the draft Plan is released. The concept statement is merely a structural outline and seldom contains any real information on specific priorities and actions. Once the draft plan is complete the scope for change is often difficult as any changes at upper levels such as regional priorities have to then filter all the way through the RCTs, MAT,s, actions and budget. Based on previous amendments to draft plans change more often occurs at the semantics level or corrections to factual information.

Therefore, in future, CCSA would recommend 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'.

- Clearly the region has been going through a challenging time in working out its structure and partners. CCSA would encourage the Board to invest appropriate time and resources in these structures and relationships. This is vital in order to progress the Boards ability to engage with the community in NRM. The importance of this did not come through the Plan.
- Some of the phrases and wording comes across from a top-down philosophy rather than ensuring everything the Board does is driven from the community upwards. An example is page 18 of the Managing our Resources volume that states NRM on EP will require "integrated, well-informed decision making and the clear communication of these decisions to the community". Such statements make it seem like all decisions will be coming from the Board and once the Board has made decisions these will be communicated to the public. CCSA does not believe this should be the philosophy of NRM. There are similar phrases throughout the document which should also be addressed. It may be helpful to include information on how the community can be involved and provide input into NRM and how the Board will seek to engage genuinely with community.

#### 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 headings of each volume are great and help to emphasise what the volume is about. They are also more community driven headings eg 'investing in our resources' says much more and is less dry than simply calling it a 'business plan'. These headings also bring the emphasis back on the natural resource. The linkages between the volumes however could be better explained.
- The Disc made available in the formal consultation period needed a large heading such as that used on the KI NRM Board disc.
- Some of the language used in the plan could be more community orientated.

#### 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 foreword is very well written. The explanation of natural resources is clear and concise and it is great to see the Board highlighting the role everyone plays in managing these resources and the links between natural resources and our use of the resource.
- It is good to see the plan delineate what natural resources are and which are addressed by this plan.
- A glossary should be included at the end of each volume with specific terms such as Ecologically Sustainable Development with meaningful community orientated definitions. A list of acronyms used in this plan at the start/ end of each volume would also be of benefit.

### Guiding Principles

- Knowing that the Board has a decade of huge change ahead it is vital that the Principle 'precautionary and risk assessment' is added to the guiding principles. (refer to Principle 14 from the State NRM plan, page 5).
- The Principle 'Acknowledging diversity', whilst admirable does not mean anything on its own and its intent needs to be articulated. The next step is to add what the Board intends to do with this? Does it mean that the Board intends to foster diversity or to manage it and if so how?

### Other general comments

- **Feedback form:** The feedback form is very general and doesn't provide much information to the community to inform how they should be making comments and what aspects they should comment on. Some prompts or specific questions on the feedback form would have greatly assisted the community in providing relevant feedback. An information pack or leaflet explaining how and why the community should make comment would have also been of significant benefit as well as information on how their comments will be considered and what feedback will be provided to submitters.
- The text boxes inserted with references/ weblinks where people can find more information on a topic is useful.
- It would be good to include information on how the strategies and targets were derived and what community consultation (besides the concept statement) has occurred thus far (eg as an appendix to the document).
- Somewhere in the plan it would be useful to include information on how research/ knowledge gaps will be filled and once collected whether there will be a free flow of information between Board, other agencies and community.

### **Volume 1: State of our resources**

- The explanation of which resources are addressed by this plan helps clarify the intent of the plan and what the natural resource management Boards are focusing on.
- The explanation of what is covered in this volume clearly explains the intent of the volume and why each theme was chosen.
- Page 5: The emphasis on the impact of climate change on natural resources and the need to make ecosystems resilient through removing threats to biodiversity is commended.
- Page 6: The section on development as a key management issue is comprehensive. It would also be good to include specific information on development in the marine environment such as marinas, which are of concern to the region.
- Page 7, Section 1.1, paragraph 3: The last sentences should also draw attention to the growing fisheries and aquaculture in the region, which are as pertinent to the management of natural resources in the region as mining.

- Page 10, paragraph 4: As well as individuals and groups, industry should be mentioned as leaders in the evolving management of natural resources. Under the third dot point it would be good to point out that sustainable fishing and aquaculture developers are also increasingly becoming aware of the impacts of fisheries and aquaculture upon natural resources, in particular species and ecosystems.
- It is good to see people as a resource upfront in the state of our resources volume and also positive that some emphasis has been drawn to council areas covered within the region.
- Page 30: It is difficult to comment on the MERI as it is not included as a separate document. There is not enough detail provided at this point.

### Chapter 3: People and Heritage

- Page 34: It is good to specify the threats to volunteer engagement and emphasise the need to partner with community groups and reward and encourage volunteers. Dot point 2, which states there is a 'risk of over-consulting leading to disillusionment', could more appropriately be phrased. It is not so much over-consulting, but that when consulted it often doesn't feel genuine from the communities perspective. Either ideas are not listened to, volunteers wealth of knowledge is not appreciated, or the consultation focuses on bureaucratic matters rather than the consulting bodies understanding what volunteers and community really want to have input into.
- Page 35: it is good to see the emphasis on population growth and impacts along the coast emphasised, however there is no mention of the impacts of fisheries and aquaculture on natural resources.
- Page 38: It is unclear given the previous discussion on tourism why the environmental indicator of increasing tourism developments is a positive thing? Is this based on social and economic drivers alone? Many of those tourism development applications have potential for negative environmental. If this is not what is implied then the graphic representation of the indicators requires clarification.
- Page 38: Information gaps also exist for community capacity, as shown by the lack of data presented for these indicators.

### Chapter 4: Biodiversity

- Page 41: The emphasis on ecosystem services is great and helps explain the relevance of biodiversity to industry. It would also be nice to spell out the intrinsic value of biodiversity and other natural assets as well.
- The information in this section is very comprehensive including threats to specific species of conservation significance. It would be good to also include threats to fish and reptiles.
- Page 59: The comment that SA has 7 categories of parks doesn't include Marine Protected Areas or aquatic reserves.
- Page 61: The threats in this section seem to be largely focused around terrestrial ecosystems. Are there any freshwater pest animals and plants or marine pests such as invertebrates? If these are covered in other sections (eg water and marine) then

this should be specified as it talks about marine biodiversity and freshwater biodiversity flora and fauna but not the threats so it becomes confusing.

- Page 61: There doesn't seem to be any mention of potential new and emerging pest animals and plants, rather only those that already exist in the region.
- Page 62: It is great to see phytophthora mentioned as a biodiversity threat, but it would be more relevant to include this in the pest threat section rather than human disturbance.
- Page 70: In the recommended initiatives, it would be good to include something on stewardship programs or similar options for assisting land managers to protect their biodiversity. Protection of vegetation will not occur through coordinating efforts, capacity building and education alone.
- Page 72: An information gap would be to classify those areas that have not undergone vegetation mapping in the region.
- Nature links are mentioned several times in this and other volumes. It would be beneficial to include a map of the intended area and a bit more information on this initiative, including how it fits in with regional priorities.
- It would be nice to include here or as an appendix, how to become involved in Board activities.

#### Chapter 6: Water

- Page 108: This section would benefit from an explanation on the differences between Prescribed Wells Areas and Water Protection Areas (plus inclusion of some of these terms in the glossary) to help clarify the differences for community. It would also be beneficial to provide information on whether the current and predicted levels of extraction are deemed to be sustainable. The 60% groundwater water dependent ecosystem requirements, appears to be an arbitrary figure spread across all groundwater resources – it would be good to spell out what this figure is based on and whether incorporating climate change will alter this percentage given there is likely to be less recharge? It would also be nice to delineate the levels of extraction across the various industries in the region. Information on the quantity and quality water measurements being taken in the various bores would also be helpful.
- Page 114: The decline in ground water levels in this chapter are possibly understated. Considering climate change scenarios this would seem to pose a very serious threat to the resource and this trend is expected to only get worse as recharge reduces.
- Page 116: It would be beneficial to spell out here whether there is a need for prescription of any other groundwater resources in the region.
- Page 124: The threats to wetland ecosystems is merely summarised (and likewise not comprehensively covered in the biodiversity section, compared with terrestrial systems and compared with ground water assets). There is no information on the types of pollution that threaten wetlands and other water dependent ecosystems, whether any fish barriers exist, the condition of the resource in specific locations

etc... Are these information gaps or are water dependent ecosystems just not covered in the same level of detail as other resource assets?

- Page 133: This section discusses marine planning but does not make links between the Marine Planning Framework and the regional Plan
- Page 145: The list of threatened species should also include: the Great White Shark (vulnerable under the EPBC Act), School shark (now listed as "conservation dependent under the EPBC Act), Porbeagle and Basking Shark (vulnerable under IUCN), Banded wobbegong, Dusky shark, Bronze Whaler, Shortfin mako, Blacktip topeshark, Blue Shark and Smooth hammerhead (all listed as near threatened under IUCN). If the biodiversity section was intended to just cover terrestrial biodiversity this should be clarified and the coast and marine section should include more comprehensive information on threatened species.

### Chapter 7: Coasts and marine

- Page 161, Section 7.5.2: The Plan notes that several fisheries are at their "maximum sustainable yield" or overfished but there is no discussion of the need to reduce or manage take and/or how that will happen. The plan states that "Recreational line fishing is considered to place more pressure on stocks than the commercial haul fishery" but there is no reference for this information.
- Page 164, Section 7.6.3: There is no acknowledgement of impacts of aquaculture on water quality such as increased nutrients.
- Page 165, Section 7.7: Mentions SA marine parks program, but there is no discussion of the links between it and EP Plan.
- Page 166, Section 7.9.1: The section on climate change doesn't acknowledge acidification, especially in relation to shellfish.
- Page 169: It is great to see the potential impacts of proposed desalination plants mentioned. It may also be good to specify some of the marine fauna that could be impacted as a result of the brine waters and discuss their importance to the region, such as cuttlefish or prawn recruitment.
- Page 170, Section 7.9.3: The section on aquaculture and commercial fisheries operations notes that "overfishing has already caused a significant decline in a number of species" but there is no discussion on the actions needed to reverse it. Also the Impacts of aquaculture noted in the plan doesn't include added nutrients.
- Page 175: The condition indicators are confusing and perhaps there is another way of wording. It is unclear whether the trends noted with ↑ and ↓ mean an increase and decrease in the indicator respectively or a trend which is positive and negative for the resource (ie not necessarily a directional trend). For example the indicator for the number of new marine pests and new incursions shows an upward arrow as being good, this could be taken that you mean there is an increase in new marine pests and this is a positive thing. It is also not stated how these indicators will be used. Are they based on quantitative data and is this baseline data able to be replicated down the track?

- Page 176: Another information gap is possibly stormwater and pollution sources and volumes.
- There could be greater emphasis placed on links between the catchment and marine resource.
- It may be helpful to include some case studies on current management in the region which has or will achieve the goals set out. This may help clarify the Board's goals and strategies as well as provide some positive information on what can be and has been done by the community for NRM.
- It would be useful to include a statement regarding how this volume can be used by community.

### **Volume 2: Caring for our resources**

- Page 11: Listing the tools used to facilitate behavioural change is commended and something that has been skimmed over in other NRM plans. This also provides context for the regulatory framework in this volume. It may be worth noting in the text that incentives are about more than just promoting adoption of best practice, but in some instances (especially under current climatic and financial conditions) landholders are aware, educated and willing to undertake voluntary action but do not have the financial means to do so. It may also be worth considering incentives that are not financially driven such as provision of the labour or materials, tax concessions, levy reductions etc... to act as an incentive for community/ landholders to undertake certain practices.
- Page 14: The management principles are comprehensive. Under dot point three regarding strategic pest management it would also be beneficial to state that removal does not impact upon other assets (eg mass removal leading to soil erosion or removal which may lead to loss of native habitat without any plans for revegetation/ rehabilitation or staged removal).
- Page 23: There appears to be an error in figure 1. Under the first box "is the activity a water affecting activity" should the down arrow box read 'yes'?
- Page 26: 5.4.1 Principles Number 8 – Activities should not:
  - e. affect water dependent ecosystems, or environmental water requirements for underground water, watercourse, wetlands or floodplains or
  - f. impact on ecological diversity and habitats.The impacts on estuaries and marine waters have not been listed?
- There appears to be no information in the plan regarding whether there is a need for further prescription or other measures to protect water resources. Over extraction of water in Big and Little Swamp systems are perceived as an issue in the region and yet there doesn't seem to be any specific mention of this.

### **Volume 3: Investing in our resources**

- Page 11, 3.3: It is important to identify and manage potential conflicts and opportunities between program areas to maximise multiple outcomes and minimise risk to natural assets. For example the use of salt land agronomy species.
- Page 12, B.1: This outcome is unclear. It is assumed the 10,000 hectares are protected in addition to the current marine park proposals, but the wording makes this unclear. Also it is unclear what 'protection and management' actually entails. Is this protection through stock exclusion, does it include rehabilitation of land already fenced off, if land is fenced off but not actively managed does this contribute to the 10,000 hectares, where are the priority linkage areas? Further information on these outcomes are required for them to have context and meaning.
- Page 12, B.5: Which ten threatened species will be managed according to recovery plans? What will this decision be based on and how will the Board or other agencies invest to manage the other threatened species?
- Page 18: Stating that the Board will review and update its implementation program annually will help provide a degree of flexibility to adapt programs to community needs as they arise. How will the community be involved in this review process?
- Page 19: There doesn't appear to be a structural coherence between the Board's program areas and the priorities outlined in volume 1. It is not clear what the intent of having the 3 Board program areas are?
- Page 19 – 22: Whilst it is understood there may be some overlap, it would be helpful if the subprogram area investments are divided further. For example it would seem to be more strategic that greater investment is placed in 1.1 than 1.2 but it would be good to have the information on this so that the Board's priorities are transparent.
- Page 21, Program 5.1: This program area should also address the impacts of marine based activities.
- Page 21, Program 5.1: This program area should also address manage the impacts of aquaculture and seafood industries on coastal, estuarine and marine resources. This area is poorly covered in this plan and inadequate investment made in this priority area. Whilst some other agencies also address this issue it is believed the NRM Board should be playing an active role to encourages sustainable resource management in this sector.
- Page 22, 10.1: It is great to see some money specifically set aside for research and investigations. It would be good if this program area also looked at addressing the knowledge gaps identified in the 'state of the resources report'. There doesn't appear to be anywhere else in the draft plan that states how knowledge gaps will be addressed.
- Based on the information provided it is very hard to get a picture of geographically where priorities lie. For example with the 'managing our coast and marine environment' program the investment would seem quite small given the huge length of coastline on EP, but if this is focusing on key hotspots the level of investment may

be feasible. If it is the latter the 'state of our resources report' should contain information on where the priorities exist for this and other resource assets.

- Page 23: 5.1 – It is important to include more information in this section as to how the NRM Advisory Committees will be chosen. Given the fact that the NRM Groups have been disbanded more information is required to explain what will be replacing them.
- Page 25 – 30: The information of the role of the Board is comprehensive and should help communities understanding and appreciation of the scope of the work the Board does.
- Page 31: The focus on potential to develop partnerships with other groups is commended and it is great to see the Business Plan has not been focused upon empire building.
- It would be useful to include a breakdown of the budget based on the investment in on ground works vs administration vs education etc...
- Page 38: The monitoring section generally lacks detail. How will community monitoring be incorporated? Will the environmental indicators mentioned earlier be monitored by the Board?

#### **Volume 4: Managing our resources**

- CCSA would like to see a greater emphasis on the implementation of the Plan. It is important to ensure that it is clear that groups wanting to take leadership on implementing actions is supported by the Board.
- It is not explicitly clear what duration is covered by the strategic plan. The table on page 15 would benefit by including the time frames the vision, goals and targets are based upon.
- Page 9: The division of the Board's investment into the 3 strategic program areas of 'land and water', 'towns and cities' and 'coast and marine' could perhaps do with an explanation on the rationale behind this division. Suggesting that 'land and water' will be based on an integrated whole of landscape approach is great, but the coast and marine environment should not be discounted from this philosophy and this doesn't help to reiterate the need for landscape management from land to the marine ecosystem. Also the justification for the program area of 'town and cities' is of concern as it makes it appear like isolated landholders will be given less attention and considering that it is these landholders that potentially own the greatest amounts of natural resources this is of concern. It is important that the justification for focusing on town and cities is made clear? Once these potential risks to understanding these program areas are addressed CCSA acknowledges that it is important to have an urban focused program given the fact that those who live in Port Lincoln and Whyalla are contributing an NRM levy and have an impact on the resources. Engaging these communities is important.
- Page 24: There doesn't seem to be any tangible links between the targets and strategic priorities and it is very difficult to determine where the linkages exist.

- Page 24: It is not clear why the regional targets are based on a 20 year time frame when it is a 10 year strategic plan. Also the gap between the intermediate outcomes of 1-5 years and the 20 year regional targets is quite extensive, which means you really need a few intermediate outcomes to be measured in order to track progress towards the regional target. Is this not just creating more evaluation work for the Board? Also 1-5 years is a large span to monitor and track an outcome. It should either be 1 or 5. Is the purpose of having an intermediate target achieved over several years so there is some flexibility in how quickly the Board can meet this target? The rationale for the decision of target timeframes is confusing.
- The targets would benefit and be given more context if the current levels are described (eg there are targets such as 'increase by x% by year x' which are meaningless unless you know what the current resource status is.
- Page 26: The intermediate outcomes would be provided with more context if there was some baseline data included in the state of the region report for comparison.
- Page 31: The list of SA Plans should also include the Living Coast Strategy.
- B.1 and B.2: Somewhere in the document (either state of the region or this volume) there needs to be an explanation of where priority areas are or what they will be based on if they haven't been determined.
- Page 31: It would be useful to include links with other agencies and legislation.
- Given the priority of developments along the coast, it would be appropriate to include some specific actions to collaborate with councils to amend the development plans.

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

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