



31 May 2017

Review Team - State NRM Plan
Department of Environment, Water and Natural Resources
81-95 Waymouth Street
Adelaide, SA, 5000

The Joinery
Level 1, 111 Franklin Street
Adelaide, SA, 5000
(08) 8223 5155
general@conservationsa.org.au
www.conservationsa.org.au
ABN: 22 020 026 644

Email: DEWNRStateNRM@sa.gov.au

Cc: Hon Ian Hunter MLC, Minister for Sustainability, Environment and Conservation
Ms Sandy Pitcher, Chief Executive, Department of Environment, Water and Natural Resources

RE: The Review of the State NRM Plan: Our Place Our Future 2012-2017

Dear Review Team,

Conservation SA welcomes the opportunity to provide comment on Phase 2 of the Review of the State NRM Plan: Our Place Our Future 2012-2017 and whether it should be amended to better achieve the goals of the *Natural Resources Management Act 2004*.

Conservation SA is an independent, non-profit and strictly non-party political organisation representing around 50 of South Australia's environment and conservation organisations and their 90,000 members. Conservation SA has developed a comprehensive view of environment policy in *South Australia in a Changing Climate: A Blueprint for a Sustainable Future*¹. This document sets out, at a strategic level, policy positions in six key environmental areas, including biodiversity, coast and marine, water, planning and development, energy and waste.

We are a partner in the *SA NRM Investment Strategy* group alongside Primary Producers SA, Local Government Association, Landcare Association of SA, NRM Boards, Regions SA & DEWNR.

Conservation SA is also a partner with DEWNR in the *Nature of SA (NoSA)*. The underlying premise of NoSA is that business as usual will not be enough to achieve the conservation outcomes that we all want in South Australia. Its co-design approach, and the idea of shifting aspects of our work, reflects the intent to progress well beyond business as usual. At the February NoSA Forum both Sandy Pitcher and I acknowledged the challenges and opportunities with doing things differently and working together. As such, and as part of responding to new ways of thinking, Conservation SA strongly recommends that this review of the State NRM Plan presents an important opportunity to not only have a much stronger alignment with the NoSA approach but to explicitly influence the framing of the Plan to better reflect the 'shifts' in thinking that have emerged through the NoSA process. The

¹ <http://www.conservationsa.org.au/blueprint.html>

environmental NGO sector expects the NoSA outcomes to be explicitly referred to and referenced in Government policy documents.

In response to the input sought:

1. Do you think that the State NRM Plan should be updated?

Conservation SA supports updating the current State NRM Plan to better reflect alignment with NoSA thinking and state-level strategic directions and the importance of effective NRM to the community.

Ideally, the State NRM Plan should be an important overarching document for the regional NRM plans and, as such, should aim to amalgamate strategic themes from these plans that would better link regional and state wide processes and priorities.

However the extent to which regional NRM boards and other actors in the NRM sector use the State NRM Plan to guide their thinking and practice is unclear. Our strong suspicion is that it has little influence.

Therefore, the big challenge with the State NRM Plan is one of relevance.

There are three current processes underway in the NRM/nature/environment space that arguably have a greater opportunity to influence priorities, funding and behavior than the State Plan:

- a) The Nature of SA
- b) The NRM Investment Strategy, and
- c) The review of the State of the Environment Report

Alignment of the review of the state NRM Plan with these 3 processes makes practical and strategic sense.

Updating the current plan provides the opportunity to align with the 2018 State of the Environment Report (SOER) for South Australia. Alignment with the SOER is a key opportunity to ensure the current state and long-term trends in environmental indicators, as well as the drivers for change identified in the SOE Report inform the high level priorities of the State NRM. This is particularly important given the 2013 SOE report did not paint a glowing environmental picture for South Australia; in fact it reported the concerning, ongoing decline in the status and trends of most environmental indicators.

The State NRM Plan has a key role in identifying mechanisms to halt further declines in the condition of environmental indicators. In particular, those indicators relating to the condition and extent of native vegetation, threatened species and ecological communities, marine, coastal and aquatic ecosystems. The State NRM Plan can provide the formal mechanism to respond to the SOE report, as long as a robust accountability framework is embedded. This should also help inform additional topics that the State NRM Plan should address.

2. What natural resources management topics should a future State NRM Plan address?

Conservation SA recommends the next State NRM Plan include key elements required under the NRM Act including the following issues of particular importance to sustainable management of natural resources:

- Assessment of the state and condition of the natural resources of the state
- Identify existing and future risks to the natural resources of the state
- A framework for monitoring and evaluating the state and condition of natural resources across the state
- Identify goals, set priorities and identify strategies to manage the natural resources of the state

Conservation SA supports the NCSSA recommendation that 'the existing vision, goals and guiding targets in the State NRM Plan are retained but strongly recommend that increased emphasis is placed on the guiding targets under Goal 3: Improved condition and resilience of natural systems as many of these targets have either not been achieved or the response is variable or declining across various NRM regions. Also that the State NRM Plan include a snapshot of condition and trends of natural resources across the eight NRM Regions based on the most recent data available'.

It is also important that a revised state Plan provides guidance on cross regional and land tenure approaches as well as outlining better ways of engaging Aboriginal people at the scale of their respective countries.

3. Clearly articulate who is responsible for the delivery of the State NRM Plan.

The current NRM narrative is that we are all responsible for NRM. However this presents major challenges with the accountability of actions. Conservation SA is of the opinion that the State NRM Plan should guide the work of DEWNR with a robust oversight body driving its implementation and reporting on priorities in the Plan. The oversight body could be the NRM Investment Strategy Group. However, such a group would need to be well resourced in order to take carriage of the Plan and drive actions. Therefore formal governance arrangements need to be embedded through this review process.

4. Should a future State NRM Plan include state-wide policies on particular subject matters? If so, what types of state-wide policies would be most useful?

As mentioned Conservation SA recommends that the NoSA relevant state-wide policies should be referred to in the State NRM Plan with a brief summary of key points of relevance. Connection between State-wide Policies and Plans needs to be articulated. Key policies to be included include: *Healthy Parks, Healthy People, Climate Strategy, Water for Good, Nature of SA* and any relevant Commonwealth polices. We also recommend that the State NRM Plan provide guidance for the tension that exists with existing policies, particularly in the areas of planning and land use, and competing resource industries (particularly mining).

4. What format (e.g. single or multiple volumes) would be most useful for a future State NRM Plan?

Conservation SA recommends online publication with relevant information accessible.

Please contact me if you have any questions about these comments. Conservation SA, through the NoSA collaboration is keen to be further involved in the State NRM Plan review process.

Yours sincerely,



Craig Wilkins
Chief Executive