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

Re: Review of the State NRM Plan – Our Place our Future 2012 - 2017 Phase 2: Draft Findings and Recommendations March 2017

Dear Review Team,

The Nature Conservation Society of South Australia (NCSSA) welcomes the opportunity to comment on Phase 2 of the Review of the State NRM Plan - Our Place our Future 2012-2017. NCSSA is a community-based, not-for-profit organisation with a diverse membership drawn from all parts of the State. As South Australia's primary nature conservation advocacy organisation, NCSSA has an active interest in the protection and conservation of South Australia's natural resources with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities, management of protected areas and remnant native vegetation.

We provide the following responses to the key areas for input in the Draft Findings and Recommendations Paper:

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

We strongly support an update of the State NRM Plan to reflect current priorities and changes since the last plan was completed. We believe the State NRM Plan provides 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.

Although we acknowledge that the current State NRM Plan is in place until the end of 2017 we recommend that the timeframe for drafting and finalising the updated Plan should be extended until after the release of the 2018 State of the Environment (SoE) Report. This would allow for the State NRM Plan to address priorities that are identified in the SoE Report in terms of sustainability and natural resource management issues. Given the ongoing decline in the status and trends of environmental indicators in the 2013 SoE Report, we strongly believe that the State NRM Plan plays a fundamental role in identifying state-wide priorities to prevent further declines in the condition of environmental indicators particularly those relating to threatened species and ecological communities, marine, coastal and aquatic ecosystems and condition /extent of native vegetation.

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

NCSSA recommends the next State NRM Plan should 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

NCSSA recommend 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. NCSSA strongly recommend 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. Links to the NRM Report Cards at the State level would be useful. For example:

<https://data.environment.sa.gov.au/NRM-Report-Cards/State-wide-Report-Cards/Pages/Native-Vegetation.aspx>

<https://data.environment.sa.gov.au/NRM-Report-Cards/State-wide-Report-Cards/Pages/Freshwater-resources.aspx>

<https://data.environment.sa.gov.au/NRM-Report-Cards/State-wide-Report-Cards/Pages/Threatened-Plants-and-animals.aspx>

The State NRM Plan should also outline who is responsible for implementation and reporting on priorities identified in the Plan following the abolition of the NRM Council.

We strongly support the following draft findings and recommendations from the consultation and recommend that they are incorporated into the next version of the State NRM Plan:

- Opportunity for the State NRM Plan to build on the regional plans and provide an “umbrella layer” that pulls together the high level themes from the regional plans;
- The Plan should remain a strategic enabling/guiding document that sets the shared vision, goals and principles for the integrated management of natural resources across the State;
- The Plan should align with the Environmental Reporting Strategy currently being prepared by DEWNR (with input from key agencies) to ensure consistency of environmental reporting across NRM projects, regional and state programs and State of the Environment Reporting.

We also support the need for the Plan to address the gap identified in the current Plan with respect to managing NRM issues across regional boundaries, private and public land and State boundaries.

3. *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?*

NCSSA recommend that relevant state-wide policies should be referred to in the State NRM Plan with a brief summary of key points of relevance. Key policies that we believe should be included are No Species Loss/Nature of SA, Climate Strategy and Water for Good. It may also be useful to refer to relevant Commonwealth policies/plans such as the Intergovernmental Agreement on Biosecurity, Australian Pest Animal Strategy and Australian Weeds Strategy that all have direct relevance to NRM in South Australia.

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

Although there may be benefits in having multiple volumes for a future State NRM Plan in terms of editing and updating content, NCCSA recommend that the plan continue to be presented in one volume so that all relevant information pertaining to the plan is readily accessible in one place.

If you have any queries about any of the points raised please feel free to contact me on (08) 7127 4633 or via email at nicki.depreu@ncssa.asn.au

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nicki de Preu', is centered on the page.

Nicki de Preu

Conservation Ecologist