



5th February 2009

Mr Bill Paterson
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South Australian Murray-Darling Basin NRM Board
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Dear Mr Paterson,

**RE: COMMENTS ON SOUTH AUSTRALIAN MURRAY-DARLING BASIN NATURAL RESOURCES
MANAGEMENT BOARD DRAFT REGIONAL NRM PLAN**

The South Australian Farmers Federation (SAFF) thanks the South Australian Murray-Darling Basin NRM Board for the opportunity to provide comment on the Draft Regional NRM Plan. SAFF would like to acknowledge the Board on the significant amount of work in the development of the Plan, with the difficult circumstances that the Board has experienced over the last few years, in particular the drought.

SAFF is the peak farming organisation in South Australia with a proud history of representation and support for farmers dating back more than 100 years. SAFF represents land holders who actively manage the majority of South Australia's natural resources. Ultimately the core to the success of NRM planning in this state is very much dependant on engaging land managers to deliver the strategic outcomes. Because of this fundamental role, SAFF has taken a leadership role in the planning and development of natural resources management in South Australia. The Federation played a significant role in the development of the NRM Act 2004 and State NRM Plan.

SAFF considers the following areas of vital importance in the successful promotion and implementation of natural resources management within the farming community. Communication is crucial in getting information to the community so they are aware of what the Board does, how their levy funds are spent and how they can be involved. Engagement of the Board with the community is essential so they feel they are involved in the natural resources management planning of their region and have the knowledge that their voices are being heard. The Board needs to be supportive of sustainable farming especially given the potential effects of climate change.

Please find attached SAFFs comments on the Draft NRM Plan. If you would like to discuss this matter further please do not hesitate to contact myself ((08) 8569 4001 or 0417 883 659) or Ms Sandra Keane, Natural Resources Officer at the Federation on (08) 8410 7233.

Sincerely

A handwritten signature in cursive script that reads 'Sandra Keane'.

for Sharon Starick
Chair, Natural Resources Committee



Comments on

South Australian Murray-Darling Basin
Natural Resources Management Board
Draft
Regional NRM Plan

by

**SOUTH AUSTRALIAN FARMERS FEDERATION
(SAFF)
NATURAL RESOURCES COMMITTEE**

On

February 2009

CHAIR: Sharon Starick

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General Comments:

SAFF would like to acknowledge the Board on the significant amount of work in the development of the Plan, with the difficult circumstances that the Board has experienced over the last few years, in particular the drought.

SAFF acknowledges and congratulates the board on the significant amount of work done to engage with the community including holding meetings in towns not traditionally targeted, e.g. Sedan, Karoonda and Pinnaroo. Meetings in these smaller towns enable farmers the opportunity to attend and participate in the process. SAFF encourages the Board to continue linkages with participants that attended and look for new ways of engaging with landholders throughout the region. For future reference, the Board may wish to reconsider some of the timing of the public meetings, e.g. it is better for landholders to attend meetings after 7pm rather than 4pm.

The fact sheets produced complement the Draft NRM Plan well. They were very useful and easy to read. Fact sheet number 4 is useful in detailing the backgrounds of the Board members and their involvement in primary production and the local community. It is essential that landholders know that local landholders and community members are representing them and making decisions that affect them and their farm business. Fact sheet number 5 and The NRM Levy fact sheet are useful as they inform why NRM levies are collected and how they are used. In the NRM Levy fact sheet, it would have been helpful to use pictures of on-ground project sites where the NRM levy has been used as the funding source.

The Plan appears to be a professional document but requires final editing to address grammatical errors, lack of labelling of some figures and inaccurate reference to appendices in Volume 1 (for example, page 16 of Volume 1 refers to Chapter 8, when it should be chapter 7).

Specific Comments:

The Federation suggests that atmosphere as an asset be integrated across other assets in their targets, as it is a cross cutting theme, like pest management.

The Plan contains strong recognition of the NRM Act but is limited when it comes to the State NRM Plan. It would be beneficial to include a clearer statement up front of Volume 1 about how the regional priorities and actions contribute to the State NRM Plan goals and strategies.

Issues that could have been further enhanced with the Plan are:

- Sustainable agriculture (irrigated and dryland) – The Plan in its current form does not place enough emphasis on the development of sustainable farming systems which will be adaptive to climate change and potentially improve some of the other assets such as water, land and biodiversity, as well as ensuring the productive capacity of the region.

- The impact of plantation forestry on the water balance and how this will be dealt with in light of the Carbon Pollution Reduction Scheme, and with climate change the great need for highly productive land to produce food given global concerns in relation to food availability.

The management of abundant native species, particularly kangaroos, has very little mention within the Plan. There are no actions/strategies within the Plan that focus on the management of abundant native species. Volume 2, page 157, table 7.12 – the table should be reviewed to take into consideration other native abundant species, such as wombats. Kangaroos is missing from the land use category ‘Grazing – Rangelands’.

The links between the MERI Plan and the state level framework are not well articulated, such as how the regional information contributes to monitoring at a statewide level

SAFF would encourage the Board to consider the development of cross-regional policies, for example pest plants and animals (goats), abundant native species, marine, management of the Coorong. Management Action Target W3.4 makes no mention of working with the SE NRM Board, particularly for the southern lagoon of the Coorong.

SAFF are open to discussion around potential partnership opportunities within the region regarding the implementation of the Plan.

The NRM levy can at times be a contentious issue. SAFF understands the need to raise a levy and the need to increase the levy. SAFF appreciates that the Board plans to increase the levy over 3 years. SAFF also acknowledges that an average increase per household is listed in the fact sheets, which is useful. A similar example for landholders and irrigators would be appropriate as a tool for communicating with stakeholders.

Industry groups appear to be missing from a significant number of Management Action Targets, eg. P1.1, P1.2, P3.4, P3.5, B1.4, B2.1, B2.2. Landholders/farmers appear to be missing from a number of Management Action Targets, eg. W2.5 irrigators and landholders, B2.1, B2.2.

The plan identifies industry in a number of different ways. A glossary differentiating between the following would be useful:

- Industry bodies
- Industry organisations
- Industry partners
- Industry groups
- Farming groups

The strategic plan and business plan appear to suggest “business as usual”. SAFF encourages the Board to consider innovative new ways, including stewardship payments, in the delivery of some of its Management Action Targets, eg. W2.5, B1.1, B1.3.

Volume 1, page 56 – L2 does not make mention of the links between soil organic matter and soil water holding capacity.

Other potential delivery partners for L1.1, L1.2, L2.1, L2.2, L2.3, L2.4 should be further explored including private consultants, such as agronomists, etc.