

Submission to the review of the State NRM Plan

Submission

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1. The Local Government Association of SA (LGA)

The LGA is a membership organisation for all councils in South Australia and is the voice of local government in this State. The LGA is created by councils and endorsed by the South Australian Parliament through the *South Australian local government Act 1999* and is recognised in 29 other South Australian Acts. All 68 councils are members of the Association, as is Anangu Pitjantjatjara Yankunytjatjara.

The LGA provides representation, quality service and leadership relevant to the needs of member councils. The LGA also operates specific units/entities providing:

- all public liability and professional indemnity cover for all South Australian councils;
- all workers compensation cover for all South Australian council employees and associated local government bodies;
- asset cover for South Australian councils; and
- extensive education and training; industrial relations; procurement; online services and a research and development scheme.

The LGA is involved in the operation of (and establishment of):

- the local government Finance Authority;
- Statewide Super; and
- Public Library Services.

The LGA has a formal State/Local Government Relations Agreement with the Premier of the State, and is a constituent member of the Australian Local Government Association.

2. Local government and NRM

The LGA Policy Manual contains the following principles and policies relating to natural resource management, which will form the basis of this submission:

Principles

- 1. Local Government has a long standing and ongoing commitment to environmental and natural resource management, enshrined in legislation and reinforced by community expectations.*
- 2. Local Government recognises the need to work with State and Federal governments, the community, and business sector, to better address environmental and natural resource management issues including resource conservation, community access, ecologically sustainable development and climate change.*
- 3. Local Government recognises that it needs to continue to adopt and promote environmentally responsible and sustainable approaches to carrying out its roles and responsibilities.*

Policy

- 1. Local Government supports the concept of an Australia-wide network of conservation reserves, recognising the intrinsic value of such resources, their role in protecting Australia's unique flora, fauna and ecological systems and their importance to the Australian psyche and economy.*
- 2. Designated conservation reserves, crown lands and transport corridors owned and managed by the State and or Federal Government should be adequately resourced to enable proper management and ensure adequate noxious weed and feral animal control, while balancing recreational access to ensure these areas are recognised and valued by the community.*
- 3. Local Government supports rail, roadside and reserve vegetation programs.*
- 4. Incentives and activities in relation to native vegetation retention and revegetation should be encouraged, subject to practical considerations concerning the provision and maintenance of community infrastructure.*
- 5. Local Government supports a balance between the protection of native vegetation, planning and development and bushfire prevention strategies for the protection of communities.*
- 6. Local Government supports the concept of integrated Natural Resource Management (NRM) as a co-operative mechanism to develop and implement ecologically sustainable use of the State's natural resources and environment.*
- 7. Local Government will work cooperatively with regional NRM boards in areas or matters of mutual interest or concern and actively seek opportunities for joint NRM planning and delivery of NRM projects where all parties will benefit.*
- 8. Sharing of information, data, and other resources between NRM Boards and Councils will be based on mutually agreeable terms.*

Local Government supports initiatives for ecologically sustainable management of the State's natural resources, including programs related to the management and protection of land, coasts, estuarine, marine, water, vegetation and soil.

3. Local Government concerns with the current NRM System

NRM Levy collection system

Under the Natural Resources Management Act 2004 (the Act), local councils in South Australia are required to collect the NRM Levy on behalf of the NRM Boards. The legislation requires that the council pays to the NRM Board the quantum identified by the Minister for Sustainability, Environment and Conservation and gazetted on an annual basis.

Local councils receive a reimbursement for this activity as a regional NRM board is liable to pay to each of the constituent councils for the region an amount determined in accordance with the NRM regulations on account of the costs of the council in complying with the requirements of the Act.

The LGA has undertaken consultation with local councils in respect to the collection of the NRM Levy, the information sought included:

- Do councils consider that the financial provisions allow councils costs to be fully recovered? If not what are the additional costs to councils of collecting the levy? and
- What is the current total amount of NRM levies in arrears?

Of councils surveyed, an overwhelming 83% considered that the reimbursement paid to councils by NRM Boards does not adequately meet the costs of collecting the NRM levy. The costs that councils consider are not covered by the collection fee include:

- losses as a result of valuation objections,
- enquiries and complaint handling,
- cost of forecasting and modelling,
- accounting and reporting,
- debt recovery costs,
- cost of applying rebates, and
- costs to configure financial systems

The NRM collection fee provided to councils by the NRM Board is based on a formula determined by regulation and is therefore fixed by the state government unlike the administrative costs of collecting the Emergency Services Levy. Many councils consider that they are in fact subsidising the state government tax collection operation.

The current NRM Levy collection system has become untenable for councils and the LGA has called on the state government to introduce legislative changes to either:

1. completely remove this obligation from the Natural Resources Management Act 2004, or
2. Change the collection method so that councils pass on only what they receive and to increase the costs that can be recovered by councils to collect the levy.

Notwithstanding that the local government sector should have no role in the collection of the levy; local government maintains its strong support for meaningful and lasting cooperation between councils, NRM Boards and DEWNR.

Engagement with local councils and local communities

While it is recognised that there are regional NRM Boards with local community representation to guide the development and implementation of regional NRM Plans, anecdotal information received is that in recent years there has been a reduction in engagement with local communities and local councils by regional NRM Boards and DEWNR staff. This appears to be related to the increasing role of NRM in DEWNR related activities.

4. Discussion on the review of the State NRM Plan

The following section responds to the specific questions asked as part of the review of the State NRM Plan.

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

1. Yes. As discussed in the Review, the State NRM Plan needs to be influential and set the overall policy for the sustainable management of natural resources. State-level priorities are a key part of this.
2. The State NRM Plan should not be a static document being reviewed every five or ten years. As a state policy document it should include a framework to enable regular updating to incorporate policies to address emerging NRM issues and threats.
3. The alignment between the State NRM Plan and regional plans need to be improved to enable issues of state significance to be identified in regional plans and to clearly specify how they will be addressed at the regional level.
4. There should be more emphasis on the development and implementation of the State NRM Plan particularly to guide the development of regional NRM plans, thereby reducing the amount of planning and planning costs on regional bodies in their NRM planning.
5. The updated plan should be based on an adaptive management approach, basing decisions on the best available information, allowing for innovation and involving communities in decision making.

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

1. State-wide policies should include:
 - a. Management of native and non-native abundant species.
 - b. Water resources and water quality.
 - c. Management of pest species (biosecurity).
 - d. Climate change adaptation and mitigation measures.
 - e. Coastal management.
 - f. Maintenance of primary production land – (land use conflict and urban encroachment).

4.3. 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?

1. The NRM topics identified above should be addressed and developed as state-wide policies.
2. The State NRM plan should inform and advise other state plans and policies, for example the 30-Year Plan for Greater Adelaide.
3. The State NRM Plan should provide the framework for reporting outcomes at the state and regional level and be made available to local government to enable it to determine appropriate levels of NRM actions.
4. The reporting framework should be designed to enable local government authorities and others to receive and also input information to enable a greater

level of reporting. Any reporting framework should be easily accessible and at no cost to users.

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

1. Multiple volumes for easier updating and targeting of content is supported.
2. The State NRM Plan should provide as a volume of the State NRM Plan a detailed State of the Environment volume, reducing the requirement for regional plans to contain similar information. The State NRM Plan volume can be regionally based and also linked with the EPA SOE reporting to avoid further duplication.
3. An annual business plan should be developed and published which identifies the NRM issues and threats to be addressed at state and regional levels, the type of actions to address the threats and the funding requirement and source.
4. Research and development requirements to address emerging threats and considerations should be incorporated in the annual business plan to provide guidance to research institutions as to where research needs are required.

5. Conclusion and Recommendations

Local government is a significant landholder/manager within the state and acknowledges its NRM responsibilities. As a significant landholder/manager the LGA considers that local government must be more involved in setting NRM objectives and outcomes at a statewide level.

Local Government is the level of government closest to the community, therefore the LGA recommends that:

1. there should be greater engagement and collaboration at the regional NRM level with local government on the delivery of NRM outcomes. State government agencies and NRM boards need to work more closely with local government to achieve sustainable NRM outcomes.
2. local government and local communities need to be involved in developing and implementing regional and state deliverables.
3. a revised decentralised model of implementing the state and regional NRM plans needs to be considered with more autonomy and decision making provided at a regional level and regional NRM organisations and state agencies working more closely with local government to achieve outcomes.

Local government recognises that NRM priorities are not spread evenly across the state and a rethink of investment approach is needed. The LGA recommends the development of a statewide annual business plan with priorities, actions and statewide investment. This approach provides the impetus for a broader statewide levy collection method rather than the current regional approach, which requires local government to collect the NRM levy on behalf of the NRM Boards.

The LGA recommends that the NRM Council be re-established with more local government involvement to provide greater direction as to where NRM investment can occur at a state and local level.

The LGA would also recommend that to improve efficiencies and outcomes the coast protection responsibilities under the Coast Protection Act and native vegetation responsibilities under the Native Vegetation Act should be incorporated into the State NRM Plan and managed through a single board rather than the multiples boards as currently exist.

The LGA strongly believes that significant NRM outcomes can be achieved through all levels of government, communities, research institutions and business working closely together.

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