Re: Feedback on Drought Resilience Funding Plan 2020 to 2024 - Consultation draft (the Plan)

I write to you on behalf of the South Australian Council of Natural Resources Management Presiding Members. We welcome the opportunity to provide feedback on the Drought Resilience Funding Plan 2020 to 2024 - Consultation draft (the Plan).

Our eight regional Natural Resources Management boards (NRM boards) work in partnership with our local communities to design and deliver services and projects that lead to resilient, self-supporting and adaptable landscapes (including primary production landscapes) and people. The NRM boards are actively involved in supporting regional communities and the primary production sector to cope with the current dry times and to build resilience over the longer term.

We are supportive of the Plan’s vision and triple bottom line approach to building resilience. We commend the focus on investing in activities that enhance the public good and deliver significant benefits to the community. Whilst the Plan has identified three separate strategic priorities and numerous separate actions, it is clear that there are connections and complex interactions between the strategic priorities and actions. It is our view that these strategic priorities and actions would be most effectively delivered using an integrated approach and existing trusted networks.

The NRM boards have the ability to effectively deliver comprehensive drought resilience programs, in partnership with our local communities that would include actions from each of the Plan’s three strategic priorities. This is an opportunity for the Australian Government to take an integrated approach, utilise existing networks and proven service providers to achieve more efficient and effective delivery of the program.

We believe that building resilience in our communities and the natural resource base will support natural and primary production systems to be more resilient to a range of pressures including climate variability and drought. This is a risk management strategy to support farm businesses, regional economies and communities to be more inherently prepared for and resilient to drought. Our approach is consistent with and supports the outcomes of the NDA and its “Principles of reform” and “Principles and process for in-drought support”. It is also complementary to the Drought Resilience Funding Plan 2020-2024 vision and strategic priorities.

As you may be aware the South Australian Government is reforming natural resources management arrangements. The Landscape South Australia Act 2019 will replace the Natural Resources Management Act 2004. I wish to assure you that transitional arrangements will ensure the continued delivery of services on-ground (including National Landcare Program (NLP2) services and projects), while establishment and implementation activities are undertaken. Until the new Act comes into full
operation, NRM boards will continue to deliver NRM services to regional communities. Further information regarding this is provided at the end of this submission.

In addition to this letter please find attached more specific comments from the South Australian Council of Natural Resources Management Presiding Members regarding the Plan.

For more information or to discuss this matter further please contact me on 0402 713 392 or mark.whitfield17@bigpond.com.

Regards

Mark Whitfield
Presiding Member, Eyre Peninsula Natural Resources Management Board
on behalf of the South Australian Council of NRM Presiding Members
Attachment A

South Australian Council of Natural Resource Management Presiding Members – Submission
Drought Resilience Funding Plan 2020 to 2024 - Consultation draft

Please note that these comments are in addition to the comments provided in the letter above. Where this submission refers to South Australia’s regional NRM boards (NRM boards) this is inclusive of the future regional Landscape boards that will be established under the new Landscape South Australia Act 2019.

General comments

• We are supportive of taking a triple bottom line approach to build resilience to drought and the pressures of a changing climate.
• We commend the focus on investing in activities that enhance the public good and deliver significant benefits to the community.
• We recommend that the aim of the Plan should reflect the three of the strategic priorities. To achieve this it could be amended to read - “The fund aims to enhance the public good by building drought resilience in Australia’s agricultural sector, rural communities and farming landscapes.”
• NRM boards are broadly supportive of the strategic priorities and actions that are captured under each of the priorities.
• There is strong complementarity and connection between the three strategic priorities and the actions under each.
• It is our view that these strategic priorities and actions would be most effectively delivered using an integrated approach and existing trusted networks.
• The NRM boards have the ability to effectively deliver comprehensive drought resilience programs, in partnership with our local communities that would include actions from each of the Plan’s three strategic priorities.
• This is an opportunity for the Australian Government to take an integrated approach, utilise existing networks and proven service providers to achieve more efficient and effective delivery of the program.
• Building resilience in our communities and the natural resource base will support natural and primary production systems to be more resilient to a range of pressures including climate variability and drought.
• Business and risk management must address all elements of farm businesses, including the natural resources that they rely on.
• Taking a triple bottom line approach will enable farm businesses, regional economies and communities to be more inherently prepared for and resilient to drought.
• We are supportive of an approach that is consistent with and supports the outcomes of the National Drought Agreement and its “Principles of reform” and “Principles and process for in-drought support”.
• It is recommended that the Plan highlights the benefits of having an innovative approach together with sound established business practices.
• Drought resilience is a national issue that needs to be shared by everyone. It is recommended that the Plan highlights this point.
• While this plan is for drought, the resilience measures outlined are also applicable for other times of rural and regional stress, for example fires, significant disease outbreak, floods and
other events that significantly impact a community. It is recommended that similar approaches are adopted for these rural and regional stressors.

- Many primary producers identify more closely with terms such as pastoralism, horticulture and viticulture etc and some do not associate with the words farm/farmers. Given the wide variety of terms to describe specific industries within the sector it is recommended that the Plan include explanation of the scope of the industries covered by the Plan and the inclusive nature of the terms farm/farmer.
- The underpinning evidence used to develop the Plan are largely about farming and management. We recommend including evidence from resilience body of work to support and add rigor to the resilience building approach promoted in the plan.
- The opportunities to assist in establishing drought resilience through research, development, extension and adoption apply across all the three objectives of the Plan.

**Partnership approach in South Australia**

- The NRM boards have worked with our partners in the primary production sector and the state government to contribute to the submission developed by the SA Dry Conditions Working Group.
- We are supportive of the five priorities identified in the SA Dry Conditions Working Group submission:
  - Improving financial and business acumen and risk management
  - Building resilience of the natural resource base to support primary production
  - Improving the capture and application of weather and climate intelligence
  - Enabling adaption and transformation through research, development and adoption
  - Protecting the health and wellbeing of individuals.

**Drought Resilience Funding Principles**

The Funding Principles are generally supported and provide a wide scope of activity to be considered by the Fund and encourage information sharing and collaboration within and across primary production sectors.

We are supportive of taking an approach that:

- Focusses on building environmental, social and economic resilience to drought and climate variability
- Aligns with and is complementary to other programs
- Invests in activities that enhance public good & deliver significant benefits
- Supports community led or co-designed programs
- Utilises existing trusted networks, partnerships and organisations – the benefit of tapping into existing partnerships and relationships is that the community is more likely to participate
- Utilises preferred service providers who have been selected through previous rigorous procurement processes, such as the Regional Land Partnerships component of NLP2 – for example the NRM boards. This would provide significant efficiency savings and fast track program delivery
- Supports incremental, transitional and transformational opportunities
- Considers the need to be enterprising and innovative in seeking to adapt and transform
- Promotes and encourage innovative approaches to building drought resilience at all levels. We recommended an additional principle is added, to encourage investment in different and innovative approaches and taking risks.
• Shares knowledge and makes it accessible
• Recognise diversity in people, businesses and landscapes
• Recognises that Aboriginal landholders are a significant part of the rangelands pastoral country of Australia. Funding provided under the plan also needs to be culturally considerate of Aboriginal landholders that run agricultural enterprises. E.g. access to information (language appropriate), different decision making processes, longer timeframes for consultation etc.

**Strategic priority - Economic resilience for an innovative and profitable agricultural sector.**

These comments are in relation to the objectives and actions under this priority:

• One of the purposes of the fund is to support transformational change however the actions do not seem to have a strong focus on relevant enablers.

• Given the increasing impacts of climate variability, many landholders are considering alternative (and) buffering industries and income streams such as tourism, carbon farming, conservation stewardship and alternative production methods that increase profit margins and ensure adaptation to climate and market needs.

• Consider adding an actions that:
  o Support market development strategies for climate resilient crops.
  o Provide education and training to farmers in the adoption and use of new technologies, including: how these benefit the farm business, how these can be integrated into farm business, operational planning and decision making.
  o Provide programs that ensure a standard of financial and technological literacy within and across agricultural industries.

• The objective and actions listed are great examples of the opportunity to include Indigenous knowledge of landscapes, plants and animals, and previous adaptation methods as a form of drought resilience and preparedness.

• Include reference to indigenous knowledge sharing through innovative methods such as ‘traditional knowledge consultants’ akin to an ag consultant that provides paid service, to read landscapes and assist farmers.

• The recent reports by ACIL Allen for Ag Min noted that substantive and transformative responses would need to consider consolidation of enterprises, movement to other commodities or markets, movement of enterprises to different climatic locations, diversification and capital investment.

• The Australian Government could consider whether there is a role for the Fund in supporting these types of actions.

• Action 1 under collaboration and building capability refers to sharing information including climate data, weather data is also important and should be included

**Strategic priority - Environment resilience for sustainable farming landscapes.**

These comments are in relation to the objectives and actions under this priority:

• Food, fibre and fuel production goes hand in hand with managing biodiversity and ecology. It is important that these things are done at the same time using an integrated approach

• Each of the actions listed are integral parts to the Plan and form a good base to guide well rounded and successful projects under this program. Some additional suggestions include:
  o Determine, promote, and support management practices that Improve natural capital and the natural resource base.
o Implementation of key natural capital improvement projects at a landscape scale to maximise effectiveness and return on investment.
o Promote and incentivise the adoption of resource utilisation saving practices and measures, particularly water efficiency measures, fuel use efficiency measures and soil management efficiency measures.
o Explore new markets and develop market access for drought resilient crops such as native food and fodder production systems and products.
o Undertaking a stocktake and evaluation of drought resilience research extension to highlight any gaps that need to be filled

- While enhancing biodiversity supports farm resilience during dry times in many situations, native wildlife conflicts can also present a major challenge (rising kangaroo impacts on pasture/crops being a common example). This is a critical area for government support. This section would benefit from a brief mention of ‘abundant native species’ and/or managing wildlife conflicts.
- In relation to Macropod management, the above point can be rolled into a broader discussion around managing livestock in the context of wild large herbivores (including pests like feral goats, feral deer and feral pigs) through the terminology of “total grazing pressure”
- Accurate and regionally relevant weather and climate intelligence is critical to enable farmers to plan ahead, build business resilience and identify future risks and opportunities.

Additional comments regarding building resilience of sustainable farming landscapes
- The SA NRM boards believe that building resilience in our communities and the natural resource base will support natural and primary production systems to be more resilient to a range of pressures including climate variability and drought.
- There is an increasing understanding of the co-dependence between natural systems and primary production systems. This includes soil health and management to support nutrient cycling and water holding capacity, water filtration to provide access to clean water, vegetation to support healthy productive soil, pollination services and stock protection, and pest animal and plant management.
- This critical link was highlighted by South Australia’s peak bodies and stakeholders in managing natural resources (Primary Producers SA, Conservation Council SA, Landcare Association of SA, the eight regional NRM boards, the Local Government Association and PIRSA and DEW) when they came together in 2016 to determine key priorities for managing natural resources. The aim was to ignite collective community action to lead to resilient, self-supporting and adaptable landscapes (including primary production landscapes) and people.
- Building resilience in the natural resource base will support natural and primary production systems to be more resilient to a range of pressures including climate variability and drought. This is a risk management strategy to support farm businesses and communities to be more inherently prepared for and resilient to drought. This approach is consistent with and supports the outcomes of the NDA and its “Principles of reform” and “Principles and process for in-drought support”.
- We support an approach that will build on the work and practical lessons of the primary production and natural resource management sectors to increase capacity to manage natural resources for on-farm resilience. This will include regionally tailored strategies for:
o Soil improvement and modification
o Pest animal and plant management
o On-farm water management
o Improved grazing management
o Strategic vegetation management and planting to support farm systems – e.g. pollination
o Farm system management - adoption of improved and innovative practices
o Utilising the best available knowledge including local, traditional and scientific knowledge
o Research and development regarding critical knowledge gaps for building resilience to drought.

- Soil management and resilience is a particular strength of South Australia’s. Soil improvement and modification is achieved through various management practices to improve soil structure, moisture holding capacity, increase soil cover and stabilisation, and general health. Options may include:
  - clay spreading / mixing / delving
  - Incorporation of organic materials, composts or agricultural by-products
  - Establishing permanent pastures on soils vulnerable to soil erosion.
  - Promotion of multi species cropping / pasture cropping
  - Promotion of improved and innovative farming practices (e.g. regenerative practices).

Strategic priority - Social resilience for resourceful and adaptable communities

These comments are in relation to the objectives and actions under this priority:

- Adaptation pathways developed through community level planning will ensure that communities and industries in the rangelands are adapting optimally and able to make considered decisions on the sustainability and liveability of the arid region, based on scientific and rigorous social research through the Future Drought Fund.

- Providing communities with the personal skills to plan and prepare for drought will in turn increase the community’s overall social resilience. Within the activities outlined, we must insure that there are components that build individuals’ resilience as well as broader social resilience.

- Experience has shown that peer to peer teachings and learnings is an excellent way to impart knowledge and skills

- Suggest that the Plan list organisations that are Nation- wide be more tangible and specific, e.g. service clubs (Apex, Rotary, Lions, and Zonta etc.), agricultural bureaus / farming systems groups, country shows, sporting clubs.

- The Plan and actions should ensure:
  - Local communities play a key role in project development and delivery within their local communities.
  - Local knowledge is incorporated into project development, planning and delivery.
  - Projects contribute positively towards community wellbeing and health outcomes

- NRM board staff and activities have played an important role in providing opportunities for social engagement, both individually between staff and farmers, and through group capacity building activities like field days and workshops and with industry and agriculture networks.
• Our social resilience building experience, training, and science shows us that the largest impact is through established trusted networks and groups. It also tells us that the largest impact we have in supporting primary producers in tough conditions is when we have established relationships with them. It is recommended that the Plan recognises this and utilises this approach.

Program Design and Delivery

• To achieve the best results it is proposed that the program should take a partnership approach to the design and delivery of specific strategies at the regional scale.
• Regionally tailored strategies and delivery mechanisms will ensure the needs of the community and industry as well as the characteristics of natural resources and primary production systems are appropriately taken into account.
• Ongoing and improved monitoring and evaluation of the strategies implemented and the natural resource condition will underpin the ability of primary producers to confidently and effectively adapt to changing conditions and be prepared for and resilient to drought.
• There is an opportunity to utilise existing networks and service providers to maximise outcomes from the investment in the program. In SA NRM boards are well placed to facilitate such an approach with primary producers and land managers.
• It is desirable to maintain flexibility in the distribution of funds, as specified in the Future Drought Fund Act 2019.
• Where possible, minimising the ‘number of hands’ the funding must pass through before it can be utilised for meaningful and rapid use is recommended.
• The NRM Boards, as preferred providers of the Australian Government (NLP2 Regional Land Partnerships), are already engaged in projects and programs that seek to support resilience for communities, in a social, economic, cultural and environmental context.
• There may be some efficiencies through the avenue of Additional Services Works Orders or similar, for delivery of activities that are complementary (but not duplicative) of projects funded under the RLP.
• The program should recognises that Aboriginal landholders are a significant part of the rangelands pastoral country of Australia.
• There is limited detail around the Monitoring Evaluation and Learning framework. The Plan describes quite aspirational goals around measuring impact through defined indicators. A similar approach was taken during the development of the RLP Services Agreements and this has caused some challenges, in terms of designing the MEL or MER framework.
• It will be important that the program design carefully consider key evaluation questions, expected outcomes and indicators, and allow applicants to factor in the costs associated with undertaking the monitoring & evaluation against these, into their applications for funding. If this aspect is not resourced adequately, it will be difficult to demonstrate outcomes and impact in a meaningful way.
• The program design will need to develop criteria to guide how the assessment of benefits and public good will be undertaken – these criteria should be available for all potential applicants to review.
• There may be some learnings from the assessment of benefits of water efficiency measures in the Murray-Darling Basin that could be helpful to consider in setting the criteria.

Additional information regarding the reform of natural resource management in South Australia

As you may be aware the South Australian Government is reforming natural resources management arrangements. The *Landscape South Australia Act 2019* will replace the *Natural Resources Management Act 2004*, which will enable the establishment of new regional landscape boards and reform natural resource management in South Australia. The new Act was assented to by the Governor of South Australia on Thursday 21 November 2019.

The main changes relate to the establishment of new regional landscape boards that will operate at arm’s length from government to deliver simple, effective and clear priorities to empower local communities to be responsible for sustainably managing their regions’ natural resources. These legislative changes aim to deliver a stronger, back-to-basics system with an emphasis on effective water management, pest plant and animal control, soil and land management.

Over the coming months, work will shift towards supporting the government to implement the new Act, which will see NRM boards being replaced by eight new regional landscape boards and a new metropolitan landscape board, Green Adelaide. Until the new Act comes into full operation, NRM boards will continue to deliver NRM services to regional communities. This transition will be carefully and sensitively managed.

Transitional arrangements will ensure the continued delivery of services on-ground including National Landcare Program core services and projects, while board establishment and implementation activities are undertaken. The Australian Government will be engaged with further in the coming months to explore appropriate transitional arrangements for NLP projects under the proposed new boards, to ensure effective ongoing delivery.