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### **Kangaroo Island's Draft NRM Plan**

'Friends of Gulf St Vincent' has been associated with 'Friends of Parks' since 2003. Our 97 members (individual and groups) have the principal objective 'to foster a unified community approach to the protection and wise use of the Gulf St Vincent'. We try to achieve this primarily through education. That includes holding at least two public information forums in different towns around the Gulf each year. We have cemented our credentials in the last year with our contributions to the publication of the 500 page 'Natural History of Gulf St Vincent'.

It is from that background that the 'Friends' offer comment on the current draft NRM plan.

#### **Overview**

We commend the documents for their scope, readable style, useful graphics and relevant references. The documentation appears not to have missed any important aquatic issue, although it would be useful to the rest of the Gulf community to have access to environmental information on operating the desalination plant on the Island.

For the issues of particular interest to us, we note a perspective on likely development of aquaculture that reflects a sensible assessment of the history of aquaculture on and around the Island. The discussion on nutrient runoff eventually leading to loss of seagrasses presents the case well. This is a significant issue to the marine environment, and we note that this is taken through all stages of the plan to appear in Regional Targets - (e.g. RT 1.6 for the Cygnet River)

The list of issues shows good awareness of aquatic pests, parasites and diseases for which there is real probability of introduction. We appreciate that management of exploitable fish stocks is not primarily a function of NRM Boards.

## **Dredging and related issues.**

We observe that possible impacts of the seabed are identified by name - anchor drag, dredging, marina developments - in the 'State of the Region', but are classified under 'Information Gaps'.

We would submit that, for dredging and marina development, there are adequate provisions to minimise environmental impact, contained in the *Environment Protection Act 1993* and its policies. These provisions reflect Australia's international obligations as a signatory to the London (Dumping) Convention, and its 1996 Protocol, which sets out procedures for assessing dredge sites, methods of dredging and disposal of material. Those provisions are contained in the *Environment Protection (Sea Dumping) Act* which has been in the South Australian statutes since 1984, but has never commenced.

Marine and building contractors in South Australia have developed effective and economic methods of dredging within silt screens or curtains, and otherwise of meeting the provisions of the International Protocol which favour bringing dredged material ashore for further use, so there is no practical, and minimal economic, reason not to abide by the international requirements.

Unfortunately, in the last two years, it has become the practice of this State Government to accord 'special development' status to just about every application for dredging and marina construction, and then virtually waive the requirements for environmental management of dredging and similar earthworks in or around water. In recent major works in Gulf St Vincent, the Minister appears to have effectively excused developers even from making public the results of monitoring of these works. This is quite inconsistent with our national obligations as a signatory to the Convention.

Of course, the real point is not just to comply with a Protocol to a Convention, but to minimise risk of environmental harm. Recent studies, and subsequent works, off metropolitan Adelaide, have confirmed the impacts that silt loads can have directly on reefs, and on impeding recovery of seagrasses which have been damaged by other factors. For those reasons, we would advocate an interim statement establishing the importance of strict environmental management of dredging and earthworks, subject to independent audit, and with results of those audits being available to the community.

## **Community and co-ordination.**

In the broader discussion of how to develop and implement the NRM plan, we note that the board sees the value of community awareness and involvement as a natural resource in its own right, as well as being a significant factor in providing the resources to carry out the NRM Plan.

On that theme, we would mention the Memorandum of Understanding for Collaborative Approaches to the Management of Gulf St Vincent by Natural Resources Management Boards. The 'Friends' was involved in workshops on this MOU in April 2008. Some of the justification in setting up the 'Friends' was that the legislation which would establish NRM Boards in South Australia - which followed a national model draft - would have the unintended effect of dissecting the large Gulfs in South Australia, with some risk, quite inadvertent, of reducing the extent of integration of management of these Gulfs.

We assume that the MOU is one of the documents referred to collectively from p. 8 of Volume 2 of the plan - 'Links to Other Plans'.

Our understanding was that the three NRM Boards which extend into Gulf St Vincent had adopted the MOU and had established basic routines in their operations to avoid conflict or duplication in activities for the Gulf. The wording that was distributed for the workshops also recognised the further integration of management of marine waters through other State and Commonwealth initiatives; particularly the Marine Planning Framework being set up by the State Government.

Clearly we support the principle of this MOU, and trust that it will continue to provide the benefits of integration of natural resource management for Gulf St Vincent and adjacent waters.

With those assumptions, we commend the Board for the comprehensive documentation of this draft Plan, and the sound perspectives it contains for practical implementation.

Yours sincerely

John Caldecott  
President  
February 2009