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**wheatbelt**  
natural resource  
management

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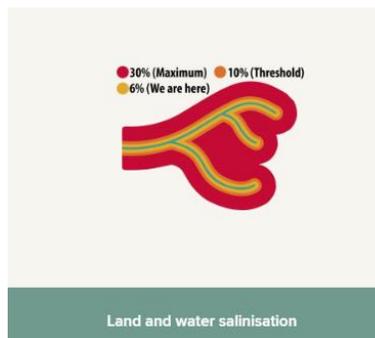
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Richard,

### ***Response to “A new Direction for Salinity Management in Western Australia : A Consultative Review”***

Wheatbelt NRM would like to congratulate the Department on the renewed focus on Salinity. The Regional Natural Resource Management Strategy for the Avon River Basin identified salinity as a key controlling variable for whole of system health. A threshold of greater than 10% of the landscape being saline is identified in the strategy as the point at which fundamental system change would occur, however this figure was determined by intelligent early guess work due to the lack of a definitive understanding and aged data. Data used to determine the current level of salinity was collected in 1998 (<http://www.nrmstrategy.com.au/land-and-water-salinisation>)



which is clearly inadequate. This data puts the percentage of land impacted by salinity in the Avon River Basin at 6%, dangerously close to the point of system change.

The consultative review offers four pillars for action:

- Information
- governance
- innovation
- investment

Feedback has been provided on each.

#### **“Information”**

The New Direction in Salinity identifies “information” as a pillar. Wheatbelt NRM supports this as a key role for Government. In particular, support is given to determining the “extent and trend in salinity”.

The Information Pillar also identifies “improving the knowledge on tools to manage salinity”. Wheatbelt NRM offers caution on this direction, it assumes that a lack of knowledge of management options is a fundamental barrier to effective action. This is not the lived experience we offer from the community perspective. While research in land management should be

ongoing, past approaches have seen considerable expenditure on scientific understanding that absorbed disproportionate amounts of funding and resulted in next to no investment in action, and therefore next to no change in salinity. Wheatbelt NRMs participation in the consultation process for the Salinity Review lead us to believe that this approach will be repeated by Departments, primarily because it is the modus operandi of science based organisations. Past work such as the “rural towns liquid assets” program were lauded during the consultation as being highly successful – the perspective from the ground is that in this program so much attention was given to data and investigations that it was a struggle to get the actual Water Management Plans completed, and that those plans are now white elephants in the offices of the Local Governments that co-invested in them.

Further caution on “improving the knowledge on tools to manage salinity” is offered based on the experience in the NAP for Salinity. Salinity is identified as a system-wide issue, and as such it takes systems thinking to have meaningful impact. Notions of single solutions, or ‘winning a battle’ with salinity were shown to not be realistic during NAP. The modelled number of 80% of land requiring to be revegetated to reverse salinity is the preeminent example of this – does it mean that revegetation should be ignored? No, it means our system has changed and we need to adapt to it. Lineal thinking should be avoided.

Wheatbelt NRMs overarching strategy is to get the community active in improving their environment, because this will create the critical mass needed to have landscape-scale change and because by working with local people we create a legacy of improved capacity to manage the Wheatbelt. Wheatbelt NRM is also a science-based organisation; however we follow the motto “scientist on tap, not scientist on top”. The Precautionary Principle was adopted by government a long time ago, that is, that lack of a complete knowledge is not a reason to delay action, however funding structures can create the same issue. Investment heavily biased towards “information” risks making any action too little too late.

**Recommendations for Information Pillar:** that priority be given to Governments role in monitoring, and that efforts in developing the knowledge base be curtailed by restricted funding levels to ensure investment in action is achieved. Investment in monitoring should take advantage of current technology and expertise like Geosciences Australia so that ongoing monitoring is relatively cheap and therefore a longitudinal data set is achievable.

### **“Governance”**

Wheatbelt NRM congratulates the Department on the reinstatement of the Soil and Land Conservation Council, and in particular the high level of community representation on the group. Wheatbelt NRM supports the actions to assess compliance approaches, and to improve integration across Government actions.

The intent to increase engagement with NRMs and other community organisations is welcomed; however caution is required as NRM groups are independent organisations that operate on a fee for service basis. Regional NRM groups are in a strong position (technical and local knowledge) to co-design the Salinity Investment Framework Phase III and to be a major player in the delivery of

that investment, but their capacity will need to be supported. Future approaches should recognise that the base level funding, that has supported us to play a role in participating in policy development for State Government, is no longer there.

Improved integration across departments for “... salinity management and broader land degradation issues” is welcomed. I offer the analogy of a tree: a tree planted for Carbon Sequestration results in a certain cost-benefit analysis outcome, as does a tree planted for salinity management, or erosion protection, or habitat, or building soil health, or creating liveable communities. It is the same tree. Unfortunately the individual cost-benefit analysis results often don't create a strong enough motivator for any individual portfolio. No one organisation enjoys all the benefits of the tree and the tree doesn't 100% solve the problem that any one department is tackling – it is part of the system.

Wheatbelt NRM questions DPRID being the right lead agency to create the integration of government action. This is not a slight on the Department but rather an acknowledgement that higher-level oversight to truly see the system-wide impact of reversing land degradation would give this issue appropriate status.

In accordance with its own strategies DPIRD is likely to bias salinity action by taking a production perspective which is a small part of the puzzle.

**Recommendations for Governance Pillar:** Co-design with community be used in developing the Salinity Investment Framework III and that this community effort be financially supported by Government. Across government integration of actions be facilitated by the Premier's Department or a collaboration of Ministers so that it is elevated to a position where a systems approach is achieved.

### **“Innovation”**

Wheatbelt NRM supports DPIRD coordinating the development of a plan for salinity management and mitigation research, however we note that the list of participants is skewed towards production focused industry groups. See the analogy of the tree. Without a systems based approach that considers all of the co benefits of actions, the research topics risk being one dimensional, and missing the big picture. The listed groups do however have the benefit of already being funded by Government to conduct research and therefore should not take a chunk of any new funding that is identified for salinity management.

Wheatbelt NRM sees great possibilities of having a positive impact on salinity by taking a systems based approach to investments in carbon farming and sustainable agriculture. We are active in private-public partnerships with a carbon focus, however see potential to expand this to create value add for salinity.

In 2017 Wheatbelt NRM completed the “planning for climate change” project for the Australian Government that categorised land in the Avon River Basin into three groupings to be used when

considering carbon plantings. This tool may be of assistance to DPIRD when looking at land tenure options.

**Recommendation for the Innovation Pillar:** Take a broad approach when selecting participants in developing the research agenda so that co-benefits are recognised and harnessed. Innovation plan to leverage existing funding for research and not drain funding available for salinity action.

### **“Investment”**

It is clear from the investment actions that Departments are focused on their own assets and responsibilities and that there is no landscape-scale approach intended. This is a familiar response from siloed Departments and emphasises the earlier point about the need to elevate “facilitate coordination” out of one department.

A landscape-scale approach was recommended by the Auditors Generals report. It is assumed that shying away from the landscape-scale approach is a Departmental response to the expected level of investment from Government. Improved data, on the extent of salinity, should be used to quantify the problem before assumptions are made about the appropriate levels of investment in action.

There are established paradigms in funding levels that should be challenged; consider this information from the 2019-20 State budget. \$852 million for the Bunbury Outer Ring Road, \$31 million for Natural Resource Management across the State. What is the expected impact on roads from salinity? The current approach is to design roads that can cope, how about we tackle the problem?

Investment at the Landscape-scale is difficult because it will not create results quickly, it requires sophisticated partnerships and system level change is required. It is understandable that the Departments responses to the Auditor General avoid the recommendation for landscape-scale action, however, it is what is needed.

The Regional Natural Resource Management Strategy for the Avon River Basin identifies the following strategic priorities that are relevant for salinity action:

- Diversity agriculture to take advantage of landscape variability
- Develop viable economic systems on saline land
- Exploit opportunities for re-vegetation in both conservation and agricultural systems
- Develop opportunities for perennial vegetation-based enterprises
- Maximise water harvesting, re-use and recycling

The approach from Wheatbelt NRM is adaption to salinity not the past approach of “winning a war”. The approach inherent in the listed actions in the review is asset protection. Asset protection does not go far enough, it leaves the community with ‘the problem’. Without landscape scale action the level of ‘protection’ needed for Government asset will just increase overtime. A review of the funding (State and Federal Government) into Lake Toolibin would highlight this point, as it would highlight the lack of balance between funding for research and funding for action.

NRM programs are identified as an investment component for salinity action. Currently the Regional NRM groups have secured tenders to deliver about \$20 million of Australian Government projects in Western Australia a year. These projects target Australian Governments responsibilities and priorities and are delivered as fee for service. While this considerable volume of work will have a positive impact on the overall socio-ecological system and therefore salinity, it is not designed specifically to do so and contracted work orders cannot be modified to address this new priority for the State Government. Wheatbelt NRM would welcome engagement with the Commonwealth Government to have salinity incorporated in their priorities for investment and development of co-funded projects from the State Government.

Wheatbelt NRM would like to be supported to participate in the co-design of the Salinity Investment Framework Phase III.

**Recommendations for investment pillar:** Government investment in salinity action is proportionate to the impacts of salinity, and that this is targeted at the landscape scale. State Government co-funds projects under the Regional Lands Partnership targeting salinity. Community groups are supported to participate in a co-designed process for developing the Salinity Investment Framework Phase III.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Natarsha Woods', followed by a period.

Natarsha Woods  
**Chief Executive Officer**  
**Wheatbelt Natural Resource Management**