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Subject: DRAFT GAB STRATEGIC MANAGEMENT PLAN [SEC=UNCLASSIFIED]  
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Dear Sir/Madam,

I'm aware the time to make submissions on the draft GAB Strategic Management Plan have passed, and would never-the-less appreciate it if you would consider our comments, below.

**NATIONAL TRUST OF SOUTH AUSTRALIA**

**COMMENTS ON DRAFT GAB STRATEGIC MANAGEMENT PLAN**

The National Trust of South Australia is a community-based, not-for-profit, non-government organization established in 1955. The Trust actively conserves, manages and promotes South Australia's indigenous, natural, built, historic heritage and culture. With assistance from many volunteers, the Trust is directly responsible for the conservation and management of 28 nature reserves across the State. In addition, the Trust, through its Natural Heritage Advisory Committee, takes a broad interest in significant conservation issues and this includes the management of the Great Artesian Basin and particularly of the internationally important natural springs associated with the GAB.

The National Trust of SA provides the following comments on the draft Strategic Management Plan for the Great Artesian Basin.

- It is appreciated that the draft Great Artesian Basin Strategic Management Plan (GABSMP) is a high-level document. In that context the Trust commends the recognition in the document that the GAB is a finite and declining resource and that consistent policy approaches are needed to protect GAB springs from human activities. As noted in the document, water extraction has had a significant and relatively rapid impact on groundwater heads (water pressure) and flow rates of springs in certain areas and careful management is needed to sustain these groundwater-dependent ecosystems.
- The National Trust of SA is concerned about the paucity of strategic focus in the draft SMP. It has a focus on general objectives and desired outcomes but very little guidance (strategy) on *how* the objectives and outcomes should be achieved. It is noted that the proposed rolling five-year implementation plans are undoubtedly intended to be more substantial and descriptive. However, it is considered that the GABSMP itself should provide a much clearer strategic framework for the implementation plans.
- Further to the above, the draft GABSMP is lacking in detail relating to priorities. There is little or no recognition in the document of the international significance of GAB springs and the need for the conservation of springs to have priority. More broadly, any discussion about priorities, partnerships and targets is only included in the most general terms in the document.
- The draft GABSMP is focused on the hydrology of the GAB and this is, to a large extent, appropriate. However, there is no recognition that the conservation of groundwater-dependent ecosystems, such as GAB springs, is linked with other factors such as grazing by introduced stock and feral animals, weed invasion, introduction of non-native aquatic fauna and, in some instances, interactions with surface water flows. Grazing, pugging and pollution by introduced animals can have a severe impact upon spring flora and fauna. While these land management aspects have been generally regarded as a State responsibility, they are common across the GAB and deserve to be included in a national strategy.

In summary, NTSA commends the efforts being made to secure the sustainable management of the GAB and its associated ecosystems. However, the Trust submits that the draft GABSMP should be subject to revisions to address comments such as the above and to provide a more strategic and comprehensive basis for management of the GAB and its associated ecosystems with much clearer recognition of the international significance of GAB springs.

Chris Grant  
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 NATIONAL TRUST  
South Australia

