



17 July 2014

Mr Bryce Wilde
Executive Director
Natural Resources Commission
bryce.wilde@nrc.nsw.gov.au

RE: Landcare NSW – Comments on Draft Performance Standard

Dear Bryce

Thank you for the opportunity to comment on the draft Performance Standard for Local Land Services (LLS). Landcare NSW (LNSW) values the partnership with Local Land Services and is committed to supporting collaboration between the Government and community to deliver sustainable agricultural and natural resource management.

The comments in this letter are offered in the spirit of partnership and follow limited consultation with the Council of LNSW. I trust they will be of value as the Standard is finalised.

In our response to the draft Standard we have referred to key documents and discussions. You may wish to revisit these to ensure relevant points are covered. These are:

- Localism position statement developed by the NRM Regions Working Group
- Statement of Common Purpose developed by the National Landcare Network and the NRM Regions Working Group
- Summary of Discussion, Natural Resources Management Roundtable
- LLS/LC forum held recently in Dubbo.

We have also drawn from a recent document produced by the Bushfire CRC *Sharing Responsibility More Than A Slogan*. This document is attached for your reference.

In the main, our comments on the Draft Standard are of a general nature and we trust that you will consider how the intent of our feedback may be translated into the wording of the document.

Overall comments

The paper is well researched and incorporates important themes that have been raised by LNSW, for example, the need for collaboration and community ownership.

LNSW suggests the Standard include a provision for evaluation at a certain point to determine how effective it has been and any need for revision.

The suggestion in the paper that partner organisations may also benefit from using the Standard is noted. LNSW actively supports member organisations and Landcare groups in all aspects of their governance and operations. As the representative body for landcare in NSW we ourselves regularly review our own governance and performance.

Implementation and Accountability

A crucial question for LNSW is the process by which the Performance Standard will be communicated and embedded in the operations of LLS. The Standard sets high expectations and its success rests in how well it is translated into the fabric of LLS, that is, the leadership, culture, thinking and actions of the organisation. It would be of concern if the Standard is perceived by LLS merely as a checklist that requires staff to devote time and effort to demonstrating compliance rather than a way of operating that is embedded in the organisation.

It is not clear to LNSW how and when information will be provided so those outside the organisation can make an independent determination regarding how the Standard is being applied. LNSW assumes that in the early stages of LLS's development it will be crucial that systems are created and feedback is provided on progress. We assume the Natural Resources Commission would play a key role in this process. It would be a concern if problems are only uncovered in audits that occur in a few years' time.

A partnership with the community

It is imperative for LLS to engage early, engage often and engage effectively with local communities. If issues arise, it is important that intervention occur early to rectify the situation and move forward. LNSW advises LLS at the regional level not to assume the "licence to operate" but to build the links and credibility to obtain it. It is essential that mechanisms for feedback are put in place at an early stage and that the leadership of LLS understands and conveys the importance of community ownership.

The experience of LNSW and our members is that social networks such as landcare groups play a fundamentally important role in building community ownership of natural resource management issues and that ensuring these social networks are strong and effective requires active support and resourcing. LNSW perceives an important function for LLS is to support and enhance community capacity.

Governance Section

LNSW supports the concept of "adaptive governance" in the Standard but suggests consideration also be given to the notion of "inclusive governance". This approach factors in community participation from the start of a decision making process. For further information see the Bushfire CRC paper. To quote from this paper:

...inclusive governance frameworks bring together government and non government stakeholders to collectively frame 'what is wrong and what needs fixing' before decisions about solutions are made.

LNSW suggests this concept be included in the Governance section of the Standard. As a starting point, dot point 3 and 7 under the heading "How could this be achieved?" could include a reference to the community.

Leadership Section

The Leadership section of the Standard could include a recognition that leadership occurs in many settings. It is important for LLS leaders to acknowledge, recognise and value the knowledge, skill, experience and authority of community leaders with whom they will be working in partnership.

Community Ownership section

LNSW suggests that dot point one in the Community Ownership section under the heading "What would this look like" (p12) should include the concept that "Local communities are resourced and supported to share responsibility for managing natural resources..." Another dot point could be added to this section along the lines of: "There is evidence of innovation and high levels of co-investment in NRM activities".

It is the view of LNSW that the concepts contained in the *Localism Position Statement* – especially those relating to devolution – have not been fully captured in the draft Standard. For example, the Community Ownership and Collaboration sections do not mention devolution.

The main message from our members over the seven years of LNSW's existence is the need for support for coordination as well as project delivery. The Standard could include specific statements about how this support is offered and how LLS demonstrates its commitment to give effect to the concept of devolution. For example the Standard could include specific provision for how LLS will enable support for local capacity building and devolution of power.

Evidence Based Decisions Section

The draft Standard does not adequately cover how monitoring and evaluation will occur outside the timeframe of a specific program or project. Landscape change and productivity change takes many years to show results. Resources and expertise are needed so that information can be accessed upon which to base decisions. The Standard could include provision for a separate unit within regional bodies where monitoring and evaluation can be carried out over time with data collected, stored, analysed and accessed.

LNSW suggests the section on Evidence Based Decisions does not adequately cover how LLS will meet this standard. There needs to be greater organisational emphasis on outputs and outcomes, and how each regional body can demonstrate that their activities are appropriate, effective and efficient in relation to sustainable agriculture, natural resource management, biosecurity, emergency management and community capacity.

Capacity and Culture

The Performance Standard could provide more emphasis on LLS staff development to ensure the requisite skills and capability. For example, the Standard could reflect the need for staff to have access to libraries, quality literature, research and systems to base their work on the best available evidence, knowledge and data. Equally, methods to ensure staff have well developed skills and attributes to work in partnership with the community within a framework of shared responsibility should be part of the Standard. These concepts could be added to the Governance, Leadership and Evidence Based Decisions sections.

The Standard could include clear expectations around culture. The mindset and culture of the organisation – with the standard set at the top and flowing through to all staff – will make a significant difference to decisions and actions. A crucial part of that mindset is to view the community as a partner. A culture that values “thinking” as much as “doing” will be of value to the organisation's effectiveness. Such a culture keeps regional bodies tuned into research that is being conducted by the CSIRO, universities and other institutions.

Terminology

Consideration could be given to defining the term “triple bottom line” which has different meanings for different people.

In references to devolution the use of term “lower levels” in referring to communities conveys inequality. It is not that the Government is at the “top” and the community at the “bottom” but that all have different roles to play in achieving shared goals.

Consideration could be given to how the term “investor” is used, for example, see the section “Audit, assurance and the Standard” on page 3. The other stakeholders who have an interest in this assurance are “citizens” and/or the “community”.

Thank you for the opportunity to offer these comments and suggestions. If you wish to seek clarification or further information from me as chair and/or Council members, please do not hesitate to get in touch via our Executive Officer Leigh McLaughlin – lmclaughlin@landcarensw.org.au or 0412 234 832.

Kind regards,

A handwritten signature in black ink, appearing to read 'RD', located below the closing of the letter.

Robert Dulhunty
Chair, Landcare NSW Inc