



**TIMBER NSW**

## **Review of the Natural Resources Commission Act 2003**

Timber NSW is grateful for the opportunity to comment on the Review of the Natural Resources Commission Act 2003.

Timber NSW, originally the Country Saw Millers Association and NSW Forest Products Association, was established in 1906 as the representative organisation of the timber and forest products industry in NSW. We continuously work with our members, stakeholders and the broader industry to build an economically, environmentally and socially sustainable timber industry in New South Wales. Many of our members have been timber harvesting sustainably for more than 140 years.

Our industry has been an active participant in various reviews and functions of the Natural Resources Commission (NRC) during its operation. Much of the work undertaken by the NRC is in our opinion of a high standard being balanced and thoroughly evidenced. Some notable exceptions include its assessment of the Riverina Red Gums & Woodland forests. In 2010 this highly politicized and unbalanced report was used to decimate the region's 150 year old red gum timber industry. More recently we were disappointed with the NRC's role in the North Coast 2023 Decision which failed to restore a level playing field to the region's non-Boral wood supply agreement holders.

The industry believes it is imperative that an independent body such as the NRC be charged with providing frank and fearless advice to government that is not unduly influenced by the philosophy or objectives of other government departments, agencies and industries who are more narrowly focused.

If a criticism can be levelled it is that successive NSW governments and agencies have either made inappropriate use of the NRC (to satisfy their own agenda) or conveniently ignored or failed to implement the NRC's recommendations when they didn't accord with their own. The shelving of the NRC's 2014 assessment of the Brigalow-Nandewar Cypress forests is but one example of the latter scenario. The NRC would be well advantaged if it could be made to be more apolitical and more fearless; delivering sound independent scientific advice that is free of corrupting influence.

There is a growing awareness within government that the State's natural resource governance systems are in need of major reform. The conservation of our biodiversity is being heavily compromised by an overly complex web of tenure-based legislation that lacks balance and accountability. The State has around fifty acts of parliament, five state ministerial portfolios and twelve government agencies.

Natural resource management has been progressively compromised by successive governments who in seeking to make their mark have simply added to the complexity and cost. Public lands in particular have been an easy target for political opportunism. Over the longer term this has given rise to enormous waste and duplication and the ineffective management of common threats and management issues.

Despite billions of dollars having been invested into a comprehensive and representative reserve system our natural systems remain in as poor a state as they have ever been. Due to the State's silo based governance system, pests and weeds continue to run rampant, forest health is in decline and mega-fires within our National Parks are destroying biodiversity at an unprecedented rate.

The absence of a comprehensive cross-tenure forest monitoring system means there is no mechanism to bring to account this poor performance. Similarly, there is no mechanism to systematically gather evidence that is needed to improve management practice. With legislated responsibilities for monitoring and auditing natural resource issues the NRC is best placed to champion the introduction of a long term cross-tenure monitoring and evaluation system. Rapidly evolving technology makes the introduction of such a system an increasingly affordable proposition.

If a decision is taken to reform our natural resource governance systems, the NRC will be very well positioned to lead the way. Unlike its sister agencies, the NRC is much less affected by vested self-interest and siloed thinking. The NRC will be more inclined to take a holistic landscape level approach and can look well beyond the operating constraints of the State's land management agencies. The NRC is best placed to promote important land management principles such as tenure-neutrality, active and adaptive management and be champions of the triple bottom line. No part of the bureaucracy or agencies in NSW, apart from the NRC, is truly focussed on balancing environmental, social and economic values. Achieving a balance is fundamental to the sustainable management of natural resources and the conservation of biodiversity.

This review is a significant opportunity to enhance the importance and independence of the NRC and the Act by conferring it the role as the landscape level natural resource and land manager.

**Do the policy objectives of the Act remain appropriate? If not how should they be amended?**

Despite the mooted changes/repeal to key pieces of legislation and the introduction of new legislation, the broader objectives are still valid.

In the medium term we think it appropriate that responsibility for environment and natural resource management policy sit best with an independent science-based body such as the NRC. To bring about this proposal will require some changes to the roles and responsibilities of the Office of Environment and Heritage (OEH) and the Environmental Protection Authority (EPA). For the EPA such a change would allow it to become a more independent environmental regulator without the current conflicts of interest it has as a quasi-policy maker.

Thank you again for the opportunity to make comment.

Yours sincerely,



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