



TIMBER NSW

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Director Corporate Services
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Re: NSW Forest Monitoring and Improvement Program – Submission on Draft Program Strategy

Thank you for the opportunity to comment. Timber NSW (TNSW) is a strong supporter of forest monitoring and has advocated for many years that a Program is needed. A Program should have been implemented over 20 years ago when the NSW Government first signed its Regional Forest Agreements.

We would like to acknowledge the NSW Forest Science unit, previously in Crown Lands and now within DPI, for making the Program a reality. In 2017 the leader of the Forest Science unit Dr Christine Stone presented the detailed proposal to the NSW Forestry Industries Taskforce and received its unanimous endorsement.

The NSW Government has been operating for far too long without objective scientific feedback on the effectiveness of its forest management policies and practices. Under this operating environment it has been impossible to tell whether public investment in forest management is delivering good outcomes or value for money.

The scientific data that is needed to inform forest policy and management may be best described as patchy and unbalanced. Where good data exists, it is not being interpreted or used to develop policy or guide decision making.

In the absence of common scientific datasets across all tenures there is no agreement on basic facts and limited information about management effectiveness. Under this operating environment, NSW government agencies are operating independently, implementing un-aligned forest policies and programs.

The NSW Government has committed to maintaining or increasing the full suite of forest values for present and future generations across the NSW native forest estate. To understand how these values might best be maintained or enhanced, there has to be some clear reference points.

The integral relationship between Aboriginal people, forests and fire is a key reference point which needs to be formally acknowledged. For thousands of years Aborigines in south eastern Australia used fire to make plants and animals abundant, convenient and predictable. Under Aboriginal management, forest values thrived.

The state of the forests at the time of European settlement of NSW is another reference point as it marks the beginning of the large scale invasion of exotic pests and weeds and the move from holistic to tenure based management. It is acknowledged that the clock cannot be turned back, however, it is equally important to acknowledge that there is opportunity to improve forest management by reintroducing the proven practices of the past.

Under the current tenure based governance system there is a reluctance to accept that we haven't achieved the right balance. As such it is incumbent upon the forest monitoring program to produce scientific evidence that will guide the need for change. Giving priority to the monitoring of things that humans can control is essential. The ones which are common and key to all forests are fire, pests and weeds.

1. Is the proposed Program design sound?

To be credible the Program must be designed so that it can operate in a scientifically independent manner that is free as possible from personal biases, emotions, and agendas. To be credible the Program also needs to be kept at arm's length from direct political influence and interference.

The governance structure proposed in the Program design affords the NRC and the agency policy officers who sit on the Steering Committee considerable powers to determine what will and won't be funded. Under this model TNSW believes the interests of the Program are at risk of being subsumed by the interests of the individual agencies. Agency policy officers are not elected officials and as such are not accountable to the public.

It appears that the Program's design is heavily dependent on the voluntary cooperation and good will of individual agencies. TNSW notes that the Program design does not explain how the Program will be implemented; other than to state that NSW agencies will have that responsibility. From this statement it is clear that the NRC are assuming 'all care but no responsibility'. This is a high risk strategy which has not worked in the past and is unlikely to work for this Program.

TNSW sees no evidence that NRC has secured the internal support that it needs. The Office of Environment & Heritage (OEH) which is the State's largest public forest management agency appears to be pursuing its own agenda. On 31 May OEH announced its own program for measuring biodiversity and ecological integrity in NSW. The method for this program makes no reference to the NSW Forest Monitoring and Improvement Program nor the NRC. On 26 June 2019, OEH released a monitoring report on the River Red Gum Ecological Thinning Trial. The report's research and findings have direct relevance to the NSW Forest Monitoring and Improvement Program yet there is no mention of how the Trial and Program relate. The OEH website states that significant collaborations between OEH and research partners are based on Memoranda of Understanding (MoUs). We are unaware of any MoU between OEH and the NRC.

TNSW is aware that the NRC took control of the NSW Forest Monitoring and Improvement Program from NSW DPI without that agency's consent or knowledge. It is disappointing that the NRC appears to have acted in such an underhand manner and find it difficult to reconcile its actions with the Program's design, which is based on trust and cooperation.

The NRC has appointed four 'Independent Experts'. It is very concerning that their expertise only covers a narrow field of interest and this leaves many areas of the Program without adequate representation. For example, none of appointed experts has expertise in sustainable wood production. We are doubtful of the alleged independence of three of the appointed experts that are from, or affiliated with, the ANU Fenner School of Environment and Society. The Fenner School of Environment and Society replaced the Forestry School at ANU and has been a staunch vocal and public critic of multiple-use forestry and RFAs .

In the Program design there is no explicit recognition of the importance of a well-designed scientific framework for data collection. The importance of baselines and the time required to establish same also appears to have been underestimated with claims of improvements in forest management practices within 3-5 years. These omissions undermine our confidence that the Program will be based on science and robust statistical design.

The integrity of the Program is compromised by the proposal to begin 'rolling out projects' before establishing a 'state-wide monitoring and evaluation Plan'.

Under the Program design, the state-wide Plan is not due to be finalised until December 2020. The Plan should have been completed by now. By December 2020 over 60% of the four-years allocated to the Program will have lapsed. The Montreal Criteria and Indicators and the principles of ESFM which form the backbone of the Plan have been in place for over 20 years. Further, the DPI Forest Science unit has been informing the NRC of options for the Plan through its two-year forest monitoring feasibility project. With all this knowledge and a framework in place, why does the NRC require another 18 months to finalise the Program Plan? The NRC's focus on planning (rather than implementation) is reminiscent of the Comprehensive Regional Assessment Process. Under this process over one hundred million dollars was invested in plans and reports leaving nothing to spend on monitoring and reporting.

The NRC intends to begin allocating funds in the absence of a Plan. How can the NRC do this, particularly in the absence of a process that will determine the funding priorities?

Without a transparent process TNSW anticipates that social and economic values may be afforded secondary priority (as has previously occurred under the RFAs). There is no clear distinction between the monitoring of IFOAs and state-wide forest monitoring. The two are quite distinct and need to be managed as such. It is concerning that a disproportionate amount of funding may be directed to IFOA monitoring at the direct expense of the state-wide Program.

How can the Program design be improved?

The Program needs to be underpinned by legislation. Legislation would afford the Program the importance it requires and deserves; ensure the cooperation and support of the agencies and provide integrity, transparency and durability.

In the absence of legislation, at least there should be a formal Agreement signed by relevant Ministers and government agency heads which affirms their commitment to the Program.

The Program needs to change its governance model to one that is truly independent. The 'Steering Committee' needs to be expanded to include Commonwealth and non-government representatives. The Chair of the 'Steering Committee' should have a scientific background and not be from the NRC. The role of NRC should be limited to coordination and assistance. The government officials on the 'Steering Committee' need to be accountable (i.e. have the authority to be able to speak on behalf of the agencies that they represent). Under the Program there should be clear accountabilities and delegations for all persons that are involved.

The Program needs to have an approved Plan before any more money is spent. The Plan should be finalised within the next six months. The Plan should include a detailed explanation of the monitoring framework Criteria and Indicators and how the Program will work in practice. The Plan should include a budget and detail how funds will be apportioned and allocated (i.e. the decision making process, the method for funding prioritisation and the standards which apply).

The Program should have a 'Technical Oversight Committee' that is made up of scientific experts. The Technical Oversight Committee should be responsible for setting standards (i.e. for statistical design) and for evaluating and approving monitoring methodologies.

We recommend that subject experts be invited to participate in 'Technical Working Groups' which are tasked with identifying opportunities and determining the most appropriate monitoring methodologies. 'Technical Working Groups' should include both government and non-government representatives. We anticipate that a large number of 'Technical Working Groups' may be needed. These groups should be encouraged to operate relatively autonomously within agreed governance parameters and timelines. The 'Technical Oversight Committee' should be guided by the advice of the 'Technical Working Groups'.

2. What are the priority issues and decision needs, the Program should focus on?

The Program should initially focus on the development of a robust and independent governance framework and a Plan that can tackle the complexity and scale of the existing forest monitoring obligations. The Montreal Sustainability Criteria and Indicators, RFAs and NSW legislation together provide detailed guidance on what this entails. Working within this framework, priority should be given to monitoring of threats which pose the greatest common risk to forest values, namely; altered fire regimes, invasive pests and weeds.

The urge to nominate and fund actual projects should be resisted until the Governance and Plan are agreed and sound technical advice is available. This will ensure that priority issues and decision needs are arrived at in an objective and transparent manner and money is not wasted.

3. How can organisations within and outside of the NSW Government contribute monitoring and research on NSW forests coordinated by the Program?

There will be considerable opportunities for universities and other qualified institutions and organisations to participate in and build upon the Program once the framework is in place. Participation in 'Technical Working Groups' is an obvious way for organisations external to government to contribute.

Before this can occur, the NSW government needs to place its own house in order. This requires a fundamental review of the governance structure and finalisation of the Program Plan. Timber NSW is keen to see the Forest Science unit within DPI playing the major role in the new governance structure as this was a program that originated in that unit and was part of the 2016 Forestry Industry Roadmap which produced in 2017 the feasibility study for forest monitoring. This was then funded in 2018 with the announcement of the forest industry allocation by Treasury.

Failure to consider and implement the governance issues outlined above will reinforce the ideological view that forests do not need to be actively managed and that resource management simply means the monitoring of a living and changing geographical area.

Yours faithfully



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