

8 July 2019

Director of Corporate services

NSW Natural Resources Commission

GPO Box 5341

Sydney NSW 2001

nrc@nrc.nsw.gov

Dear Sir/Madam

Re: NSW Forest Monitoring and Improvement Program- Draft Program Strategy

I wish to provide some comments on the draft program strategy as above.

I am a practicing-chartered accountant of in excess of 40 years, practicing in rural and regional NSW, predominantly on the Mid North Coast of NSW. My family is of a rural background, being involved in dairy farming, professional fishing, beef cattle and forest harvesting on private property.

I operated a diverse accounting practice, involving many rural clients including those involved in all aspects of the timber industry from private property forest management, harvesting practices (state forests and private), through to timber sawmilling operations. My professional expertise in the practice and currently, is in business development and management, business restructuring and governance, rural industry, mediation and meeting facilitation, contract negotiation and financing.

Since the sale of my general practice in 2013 I have been concentrating on consulting to a number of timber sawmilling operations sourcing timber from both Forestry and private property, and have been involved in consulting on private property harvesting operations. My experience includes the management and business practices involved in hardwood timber production from forest regrowth, harvesting and sawmilling.

I Comment as follows:

1. Participants in the Program

Page 1 states

"The program will deliver information and evidence to support the strategic management of forests and forest practices in NSW on both public and private land."

Page 2 states

"A multi-agency steering committee, including independent scientific experts will guide the development, delivery, and implementation of monitoring, evaluation, and research plans"
And

"The program seeks to leverage and partner with other NSW Agencies, such as the NSW National Parks and Wildlife Service, and Local Land Services, to strengthen the overall evidence base for Forest Management."

This is further detailed in the Governance structure set out on page 8.

I have concerns with the scope and involvement of "other agencies" not actively involved in the direct management of forests specifically involving producing timber for harvesting. This is particularly so where in the total forest footprint, if you include national parks and crown lands, the harvestable forest footprint itself is less than 10% and I understand the harvestable areas are less than 5%. There is the potential for over-representation from agencies or Depts not involved in forestry harvesting operations.

I cannot see there is adequate representation for private property land holders and also question whether the program should include private property (see later comments). The panel of four experts included on the Forestry Monitoring Steering Committee includes three from one source, the Fenner School of Environment and Society, as being "Independent".

Recommendations:

- a) More clearly define the roles of each agency and advisory group in the reporting and analysis process and what their objectives /outcomes should be in their reporting.
- b) Develop separate reporting groups or subcommittees with their defined roles, technical skills and timelines. E.g. there should be scientific, technical, social and economic reporting groups.
- c) Provide a more balanced representation of Independent Experts including for example scientific and technical personnel from the Department of Primary Industry, who appear not be represented, and some representation from private industry for private property holders if they are going to be reviewed.
- d) If the above is too difficult or seen to be too expansive, then the review would need to be more defined and limited in its application, limit the participants to report on the defined areas in line with the defined scope and objectives – see below.

2. Scope, Definition and Purpose of the Review

At this stage it is difficult from the draft program strategy to clearly define what the scope of the review is to achieve, it seems to be an attempt to be all encompassing, involving as many participants as possible and as many objectives as possible., yet in my view not totally representative across all tenures. While there are details provided on page 3 and 4 for what is Ecologically Sustainable Forest management, and Effective Adaptive Forest Management, there

is a need in my opinion to distinguish between the different forestry tenures and landscapes, and a determination of the outcomes required relative to their purpose.

There is the potential danger, that the review will become overly focused on one footprint or tenure in order to achieve a certain outcome, that may not be consistent with the original strategy.

Recommendations:

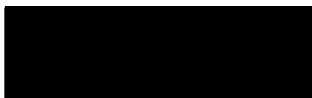
- a) Include in the review a definition as to purpose and allowable use of each type of recognised forestry landscape and tenure e.g. National Park and Management, private property, harvestable forest areas.
- b) A recognition of the legislated footprint of each of these tenures and provide the objectives required to maintain them in a sustainable, economic and environmental manner. (e.g. via the various committees recommended above).
- c) Consider breaking the review to be separate across each tenure and create different and independent reviews more defined to the purpose and scope of each use.
- d) Using separate independent review as in c) more closely aligned scientific, technical and economical based personnel I can be used with the appropriate expertise in their professional field can be used. E.g. Harvestable Forestry under Department of Primary Industry (DPI) Managing the regional Forestry agreement and IOFAs; National Parks under Dept of Environment, EPA and OEH. This would fit in with for example the already agreed forestry road map previously adopted via DPI.

3. Reporting Processes, Timelines and Future Monitoring

The strategy indicates that it is aimed at reporting in 3-4 years' time. Given the broad nature and scope I would suggest for public accountability that reports be at least yearly if not six monthlies to monitor progress and direction. I would suggest if the view was to breakdown the areas as indicated above. or streamline it as suggested, reporting could be earlier, with then sufficient time to consider the outcomes and implementation strategies well within the four years.

There is also an indication (RefP1, P2, P5) of ongoing monitoring evaluation etc in excess of what is currently required under current legislation particularly in Harvestable forest areas, but little mention of that required in other forest tenures. Stating these at the exclusion of other areas seems to be determining a direction that is not fully inclusive of the total forest landscape. We need to be sure we are not creating another layer of bureaucracy "in the public interest", nor creating unwarranted costs where current legislation is adequate. The process should therefore include these factors as part of the determination.

Yours sincerely,

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