

4 July 2019

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

I welcome this project, but it is 20 years too late. It should have been initiated after the signing of the first NSW Regional Forest Agreements and incorporated into a normal periodic five yearly review of forest health and structure irrespective of whether forests are managed for conservation or production.

I am also concerned that this project is being run by the Natural Resources Commission who I respect, but their strengths are in policy advice and research they are not forest managers! This is a practical resource mapping and analysis exercise which requires the combined input of experienced NSW forest researchers and forest managers.

The project would be improved significantly if it was led by a researcher like Dr Christine Stone within the NSW Department of Primary Industries she is arguably Australia's most pre-eminent remote sensing forest researcher and was awarded the Institute of Foresters of Australia's highest honour in 2017, the NW Jolly Medal. She was the first woman to win this prestigious award. She should be supported by steering committee of practical forest managers from organisations like Forestry Corporation of NSW, New South Wales Parks and Wildlife Service, the NSW Department of Primary Industries and private forest managers, possibly through Local Land Services Private Natural Forest Unit.

The draft strategy makes the very reasonable statement that – *“People in NSW are concerned about the ecological sustainability of NSW forests and whether there is sufficient reliable information available to track forest health, productivity and sustainability”*.

However, finding information about the performance of conservation forests in maintaining ecosystems and their sustainability is very hard.

Australia has an extinction crisis with the number of threatened species now over 1,700¹ of which 1420 are forest dependant² and urgent action is needed.

According to Environment NSW there are almost 1000 animal and plant species that are at risk of extinction³.

The community have right to information about the status and management of threatened species and how they will be saved from extinction.

Developing a baseline dataset of consistent forest information across all tenures is critical to establishing the foundation for ongoing monitoring so that management practices on all

¹ <https://www.environment.gov.au/biodiversity/threatened/species>

² Australia's of the Forests Report 2018

³ <https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species>

tenures can be analysed consistently to determine if forest health and condition is improving or not!

Reviewing IFOA's is a distraction and a waste of scarce public resources and funding. IFOA's apply to such a small percentage of the total forest estate in NSW probably substantially less than 10%. The multiple use forests that are harvested for wood products are already monitored by two if not three independent auditors who are reviewing their approach to sustainable forest management.

A major concern is the condition of National Parks and possibly the private forest estate.

As mentioned, the community has a right to know what is happening in their National Parks and other forest reserves and whether they are meeting their conservation objectives.

Australia and New South Wales Conservation Areas

Australia has 46 million hectares of forests in national parks and conservation reserves⁴ which is significantly more than the area of National Park in the United States which is approximately 30 million hectares and approximately 32 million hectares in Canada. Australia (approx. 750) and New South Wales (approx. 250) have in number more National Parks than these two countries combined and yet we have this massive problem with threatened species.

As a result, it is easy to draw the conclusion that creating conservation reserves will not prevent species extinction, it may even hasten it as a couple of the following examples illustrate:

Leadbeaters Possum

An excellent example of incomplete data and why broadscale across tenure forest monitoring is required is Leadbeaters possum (*Gymnobelideus leadbeateri*) in the Central Highlands forests of Victoria.

There are constant media claims that the populations of this species are in a terminal decline.

In response to these claims the Victorian Government established a taskforce to assist in understanding more about this species, in particular where it lives and the following map illustrates that the majority of the recent sightings of this species have been found in the multiple use forests and not in the National Park. See following map from the Victorian government website⁵.

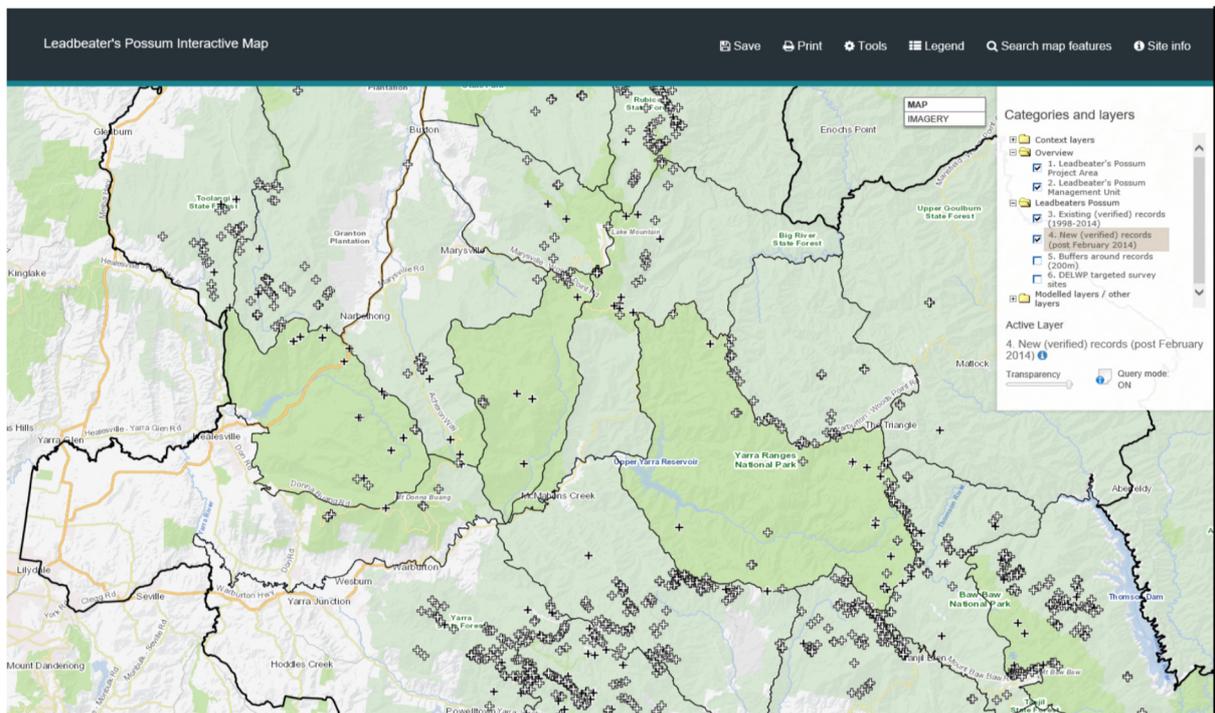
Therefore, does this mean that:

- Leadbeaters possum are rare in National Parks?
- Is the management of the multiple use forests favouring Leadbeaters possum?
- Would the creation of a new National Park be detrimental to Leadbeaters possum?

A quick review of the Parks Victoria's Annual Report 2017-18 finds no mention of the status of this species or any other statewide statistics on the populations and actions to prevent extinction of threatened species in Victoria! This information may exist but it is not easy to find.

⁴⁴ Australia's State of the Forest Report 2018

⁵ http://lbp.cerdi.edu.au/possum_map.php



Source: - (http://lbp.cerdi.edu.au/possum_map.php)

Southern Brown Bandicoots

Another example is evidence from the NSW Far South Coast suggests that the creation of reserves has in fact been detrimental to the populations of some native fauna such as the Southern Brown Bandicoot - (*Isodon obesulus obesulus*). The threatened species scientific committee made the following advice to the Commonwealth Minister for the Environment in 2016 about populations of SB Bandicoots over a 10 year period.

Population	State	Decline
Ben Boyd National Park	NSW	44% (1999 to 2008)
Nadgee Nature Reserve	NSW	47% (1999 to 2008)
Port Campbell	Vic	>70% (past 10 years)
Pines Flora and Fauna Reserve	Vic	100% (extirpated around 2006)
Mt Lofty Ranges – northern metapopulation	SA	100% (extirpated around 2009)

Source: *Threatened Species Scientific Committee – advice to Minister for Environment May 2016 [Note - Extirpated means to wipe out or totally destroy!]*

Concerningly, the Office of Environment and Heritage in their 2017-18 Annual Report makes no special comment on the plight of all the threatened species in New South Wales. The Save our Species (SOS) program is an important step but it covers only a small number of species compared the 1000 species that are listed as threatened. I suspect there are reports somewhere on the status of threatened species in NSW but they are not immediately obvious to a casual observer.

The community has a right to know what actions are being undertaken to protect these threatened species and they would expect that the National Parks service through the management of conservation reserves would be the leading authority to provide this.

Australian National Audit Office

Another concerning reference is a report from the Canberra Times in June 2019 on a report by the Australian National Audit Office⁶

“Australia's most iconic national parks, including Uluru and Kakadu, are not being effectively managed, the national auditor has found.

The government body tasked with managing six Commonwealth national parks, the Director of National Parks, lacked oversight and direction, according to an Australian National Audit Office report released Friday.

The Director of National Parks has not established effective arrangements to plan, deliver and measure the impact of its operational activities within the six terrestrial national parks,” the report said.

As a result, it is unable to adequately inform itself, joint managers and other stakeholders of the extent to which it is meeting its management objectives.”

There appears to be something wrong with the management of conservation forests and so the NSW Forest Monitoring and Improvement Program should concentrate on these forest types and the private forest estate rather than the multiple use forests and IFOA’s which are regularly reviewed and researched.

Moving Forward

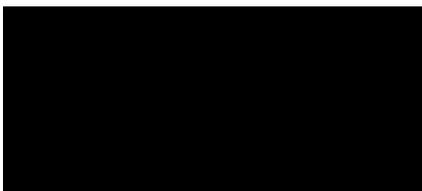
Currently we may not know how to solve all the issues with threatened species and how to improve forest health and structure so the strategy of active and adaptive management or learning by doing as suggested in the Draft Strategy is appropriate.

For this reason, I am not comfortable with the independent experts who have been appointed to this review. Active and adaptive management requires the input from experience forest managers who understand what management systems will potentially work and how they may be implemented.

The current independent experts while pre-eminent in their fields of expertise are not practical forest managers and as such will not be able to provide informed comment on the implementation of a workable forest monitoring and improved forest management systems

This project is urgently required but I am concerned that the approach is wrong and there are no practical forest managers involved to guide a project which is desperately needed. I am happy to provide additional comment if required.

Yours sincerely



⁶ANAO slams management of Australian national parks, including Uluru and Kakadu – Finbar O’Mallon June 24 2019