



27th April, 2025

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I welcome the opportunity to submit the following submission to the *Natural Resources Commission's Independent Review for the NSW Plan for Nature*. I have been operating my family's third generation grazing operation across 2600HA on the Southern Monaro since 2012, having returned from a career in Accounting. I have previously watched and now experienced the failure of native vegetation regulations since State Environmental Planning regulation 46 was introduced in 1997. Within in this near 30 year period the NSW Government on the Monaro has through overreaching and misguided regulations:

1) failed to effectively identify, quantify and protect any significant area High Conservation Value (HCV) or endangered grasslands on the Monaro, and

2) has seen a severe degradation of ecosystems primarily due to the expanding monoculture of highly invasive exotic weeds (namely African Lovegrass, Serrated tussock, and Chilian Needle Grass).

In my opinion the failings can be attributed to the following:

1. A disjointed and confusing regulatory environment;
2. An endemic failure to engage with direct policy stakeholders (land holders) in policy design;
3. A mindset of regulate and punish, as opposed to identify, protect and reward;
4. A focus on land clearing as the primary threat to conservation, and complete ignorance to the far greater threat of noxious weed expansion across grasslands; and
5. Insistence on a one size fits all policy and regulatory tool (i.e. NVR Maps), despite environmentally diverse ecosystems and geographic locations across NSW.

Ultimately since 1997 the NSW Government has in perpetually bungling vegetation management legislation failed to deliver on one pillar of a triple bottom line assessment of public policy. This being the delivery of environmental, social and economic outcomes. Instead has allowed regulations to be a feel good for misguided urban ideological thinking, a political tool for partisan brinkmanship and a method to inequitably impose social cost on an individual. The resulting effect has seen a degradation of the environment and severe encroachment on fundamental property rights of primary producers leading to a culture of frustration and distrust between policy owners (Government) and policy implementors (land owners).

It would be my recommendation that in order to achieve proactive environmental outcomes on the Monaro the

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NSW Government should:

- Abandon satellite disturbance based mapping or in conjunction to it develop specific Monaro Grassland codes under the LLS Act that allow landholders to opt in to a proactive property based management plans that at a minimum:
  - Recognise differing conservation values of private grass based environments, importantly distinguishing between what are LCV native pastures (non-Regulated) and HCV native grasslands (Regulated). *This has proved impossible to achieve by satellite based disturbance mapping;*
  - Reduce population thresholds for highly invasive weed infestations (ALG, serrated tussock, Chilean needle grass or any variety deemed a high risk to conservation and agricultural productivity) within native dominant grasslands before broadacre control methods can legally be implemented. In conjunction, provide clear guidance as to interaction of NSW Biosecurity Legislation and Native vegetation legislation;
  - Integrate a reward mechanism or stewardship payment for the identification, quantification and protection of high conservation ecosystems rather than having a separate and somewhat secretive Biodiversity Conservation Trust model.

It is in my opinion that under a model as outlined above, we can proactively identify, quantify and protect high conservation grasslands and critically endangered ecosystems in a socially equitable and economically favourable outcome to all stakeholders. Something that all levels of Government have failed to achieve across the existing and historic policy landscape.

As a bare minimum the NSW Government should:

- Have a fundamental principle to engage with landholders prior to implementing regulations and legislation as to how best deliver environmental outcomes that can achieve synergies in social and economic outcomes; and
- Develop an accurate regulatory tool, that brings together the landholder obligations under:
  - NSW LLS Legislation;
  - NSW Office of Environment Critically Endangered Ecosystem listings;
  - NSW Biosecurity obligations;
  - Federal environmental legislation specifically the EPBC Act 1999; and

Integrate this tool into a more effective stewardship model than the Biodiversity Conservation Trust model.

I again welcome the opportunity to make the above submission, and would willing to partake in any further consultation, questions or further discussion to the above concise summary of what is a more nuanced topic.

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