



27 April 2025

Natural Resource Commission
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Sydney, NSW 2001
E: nrc@nrc.nsw.gov.au

Dear Sir/Madam,

Thank you for the opportunity to provide feedback on the NSW Plan for Nature independent review. Please find attached our submission.

Yours sincerely,

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Timber NSW feedback on NSW Plan for Nature independent review

1. What do you consider is the most significant action(s) we can undertake to protect and restore biodiversity and ecosystem function on private lands?

Having government policies and programs that are more supportive would result in landholders delivering more effective sustainable land management and production outcomes.

Coercive and punitive approaches do not work and risk building long standing resentment.

Consistent messaging and an holistic approach to common threats and best management practice is essential.

In NSW there are a bewildering number of government agencies that landholders must deal with such as Local Land Services (LLS), National Parks and Wildlife Service (NPWS), Forestry Corporation NSW (FCNSW), Crown Lands, Rural Fire Service (RFS), Councils, NSW EPA, Water Utilities, Power Utilities, DPIRD and DCCEEW. The siloed nature of these agencies and their different governance arrangements, means that their messaging to landholders often lacks consistency.

As the main provider of services to landholders, LLS could take greater responsibility for coordinating land management services. The value and benefit of one-stop government platforms has been proven with the Service NSW and MyGov models. Why not have a similar one-stop governance model for land management services?

Landholders are self-reliant, but when it comes to issues that are beyond their sphere of control, government support is needed. Common threats like pests, weeds, disease, high intensity fire, and extreme weather events are tenure blind and cannot be effectively managed at a property scale. Best land management practice requires government support to promote long term investment and discourage exploitative practices.

Education, training and advice in best management practice will always be important and required. To be of value, these services need to be delivered by experienced, highly qualified professionals.

When it comes to common issues, landholders should be encouraged to look beyond their property boundaries and cooperate with their neighbours. This includes working more closely with public land management agencies (i.e. NPWS and FCNSW).

The formation of sustainable land management groups at a local landscape scale is an effective way to achieve this. Such groups have potential to be highly effective delivery agents for government programs. Landholder groups have inherent capacity to self-organise, plan and make highly effective use of government funds and resources.

2. How can we further improve soil, water and vegetation management to protect and restore biodiversity while delivering sustainable economic outcomes?

Little is known about the soil, water and vegetation management on private land. To effectively manage and protect, you need to first understand what you have. Investment in baseline data is essential to gain a better understanding. Providing incentives to landholders

to have their properties surveyed will be required along with assurances that the results will not be used to restrict their production systems in the future.

3. What do you consider is the most effective way to further support and enable landholders to deliver sustainable land management and production outcomes?

An effective way to further support and enable landholders to deliver sustainable land management and production outcomes, is to acknowledge that biodiversity and sustainable production can coexist.

Private landholders that are protecting biodiversity by actively managing pests, and weeds and applying best fire management practice and still engaging in sustainable production should be eligible for government grants and incentives.

At present landholders must cease production and enter into perpetuity agreements to be eligible. Having such a narrow approach to conservation is discouraging best practice and unnecessarily alienating landholders.

4. Is there any other information about this topic you would like to share with us?

The claims by the NSW Plan for Nature that *biodiversity in NSW is in crisis* is an attention-grabbing headline, but it is not supported by scientific evidence. In the absence of any notable investment in long term scientific monitoring, New South Wales remains ignorant about the true state of its biodiversity on both public and private land.

Long term monitoring, evaluation and reporting, where all plants and animals and ecological processes are considered at a landscape and regional scale, is essential for gaining a proper understanding of the state of biodiversity.

In the absence of long-term monitoring, the number of species Listed as Threatened is relied upon as a key indicator of biodiversity performance. Based on this indicator the claim that *biodiversity in NSW is in crisis* is unsurprising with over 1,100 species listed Figure 1.

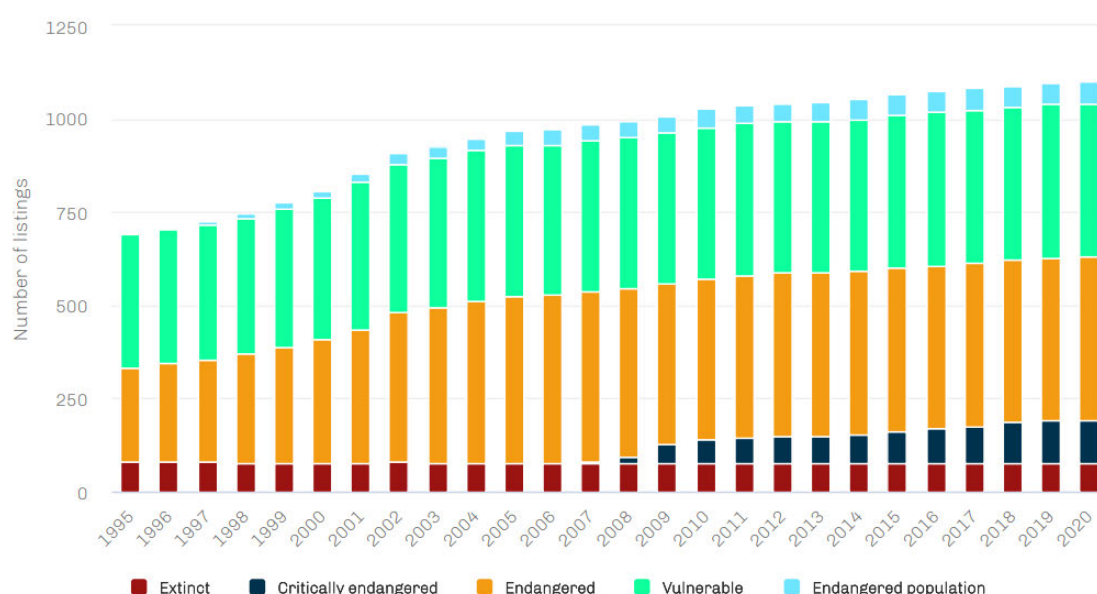


Figure 1 – Total Listing of threatened species 1995-2020

There are, however, four key shortcomings of the Listing process that are rarely considered:

- Firstly, the process of Listing is often triggered by opinion and isolated studies rather than sound scientific evidence. Data supporting a Listing seldom meets a standard that can be objectively regarded as scientifically adequate or representative. When data is deficient, 'expert opinion' and 'scenario modelling' are relied on. Unfortunately, these approaches are poor substitutes for empirical data and rarely prove to be accurate.
- Secondly, when data is deficient, the decision to List is often influenced by the application of the Precautionary Principle¹. Applying the Precautionary Principle involves making assumptions about the likelihood and severity of threats with worst case scenarios often adopted.
- Thirdly, the international standards that apply to the Listing of species have been set at level that is suitable for use by developing countries. For advanced economies like Australia, the lower standard means the process can be manipulated to achieve a desired outcome.
- It is not until a species is Listed that its conservation status is properly assessed. Post Listing surveys usually reveal that the species is far more common than first thought. However, there is little to no incentive to de-List a species if it is subsequently shown not to be under threat.

With public funding, resources and tenure change all linked to the Listing process, there is a perverse incentive to increase the number of species and communities that are Listed. If your business is 'saving the environment' the more species that can be Listed the better.

Investment in having things Listed also works against investment in long-term monitoring, as the two things compete directly for public funding.

Tenures dedicated to biodiversity conservation have for decades been seen as the solution. For the advocates of national parks & reserves, there is strategic advantage in maintaining the mystery about the state of the environment. Without evidence from scientific monitoring, unsupported claims that *biodiversity in NSW is in crisis and more restoration and protection is urgently needed* can go unquestioned.

The question that the NSW NRC should be asking is, what is the true cost to the economy and society of relying upon Listed species records as the primary driver of biodiversity conservation?

¹ If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.