Summary of submissions received
Draft Program Strategy – Forest Monitoring and Improvement Program
July 2019

1   Background

The Commission released a draft Program Strategy on its website for verbal or written public comment. Over 70 stakeholders were alerted via the Commission's mailing list.

2   Submissions

The Commission received **16** written submissions on the draft Program Strategy.

Submission number	Organisation / individual
1	Wilderness Society
2	Australian Wildlife Society
3	Vic Jurskis
4	NSW Apiarists Association
5	South East Region Conservation Alliance
6	NSW Aboriginal Land Council
7	Don White and Co Pty Ltd
8	Nature Conservation Council, National Parks Association, Northeast Forest Alliance
9	KPS Global Pty Limited
10	South East Timber Association
11	Environmental Defenders Office NSW
12	Timber NSW
13	Margules Groome Consulting Pty Ltd
14	Western Sydney University
15	Nature.Net Pty Ltd
16	"Celebrating Eart and Art" radio program

The Commission is committed to open and transparent public consultation processes.

All submitters have consented the publication of their submission online. In some cases, an author did not consent to the publication of their name or requested that their name be withheld, and these submissions are published under 'Name withheld'.

Steps have been taken to remove the personal information of authors and identifying information where appropriate. Factually incorrect, defamatory or confidential information has been redacted.

The submissions do not represent the views of the NSW Natural Resources Commission.

3   Submission feedback

The following section provides a summary of the feedback received in submissions and does not represent the views of the NSW Natural Resources Commission. The Commission is currently considering the feedback and will publish an updated Program Strategy and a synthesis of responses to the feedback provided in the submissions.

3.1   Key themes

A monitoring and improvement program is supported

- Most submissions considered the monitoring program was over-due, and now provides an opportunity to provide information to inform forest management.

- Most submissions supported monitoring to inform adaptive forest management.

- Some submissions highlighted the need to focus on long-term monitoring.

- Several submissions supported the proposed risk-based approach to prioritising monitoring and noted the importance of scientific rigor.

- Some submissions highlighted that forest monitoring should be undertaken independently of NSW Forestry Corporation, which Forestry Corporation should also contribute to funding.

- Some submissions highlight the large scope and complexity of the program.

Governance arrangements should be revised

- Most submissions proposed revisions to the Program's governance arrangements, including:

    - expanding the Steering Committee to include industry (including apiarists), environmental conservation, community, private land holders and Aboriginal representatives

    - appointing additional independent experts to the Steering Committee, in areas such as economics, fire management and private industry

    - establishing additional working groups and committees for specific issues (for example, scientific, technical, social and economic reporting groups).

- Some submissions highlighted that the Program should be supported by legislation to ensure durability, and in the interim there should be an inter-departmental agreement.

- Some submissions considered Department of Primary Industries' Forest Science unit should have a strengthened role in the Program's governance.

- One submission noted that the role of each agency and advisory group under the Program should be more clearly defined, including each agencies role in reporting and analysis.

- One submission questioned how the Commission will hold NSW agencies accountable.

- Several submissions noted their support to the Program's commitment to transparency and wanted this to go further, including making publically available the scientific advice of independent experts.

Elements of the strategic approach should be improved

- Some submissions noted that the Program should have a greater focus on the NSW Ecologically Sustainable Forest Management (ESFM) Criteria and Indicators.

- Some submissions noted the Program needs to have a balanced approach to the monitoring and evaluation of state forests and the conservation estate.

- On the other hand, one submission raised concerns about the proposed scope of the Program to monitor and evaluate forest management across all tenures, suggesting that a triple. bottom line approach of ESFM is for forestry only and is not an appropriate framework for managing national parks and conservation areas.

- Some submissions noted the absence of a specific focus on Aboriginal culture, heritage and land management in forest management and Aboriginal engagement.

- Some submissions highlighted the need for the Program to review data from existing monitoring, evaluation and research programs in NSW and evaluate this information to inform management.

- Some submissions proposed the program should monitoring and report on how the program's budget is distributed and contributes to improved forest management.

- Some submissions proposed that the Program should use triggers and thresholds for monitoring, which imitate a change in management practice.

- Some submissions proposed to include a specific focus on climate change and measuring its impacts and developing adaptive responses.

- Some submissions proposed to include a specific focus on pests and weeds, such as lantana and Bell-Minor associated dieback.

- Some submissions proposed there should be a stronger focus and commitment to ensuring effective and informed reporting on Regional Forest Agreements.

- One submission proposed the need for the program to distinguish between different forest tenures and landscapes and determine the outcomes required relative to their purpose; for example, separating the monitoring and evaluation by tenure with a different scope for each.

- One submission proposed the use of an online Monitoring, Evaluation, Reporting and Improvement Tool (MERIT) to upload program data about the progress of projects on a continual basis.

- One submission proposed ongoing economic analysis should be part of the Program, including economic analysis of a range of forest industries.

- One submission noted that reporting under the Program should be at least yearly, or preferably every 6 months to provide an update on progress and direction.

- One submission opposed the idea of delivering early projects, in parallel with finalising a state-wide plan for forest monitoring and evaluation.

- One submission proposed establishing a long-term goal for the forests of NSW.

- Two submissions called for the Statewide forest monitoring and evaluation plan to be finalised in 2019 with consistent biodiversity measure across tenures

    - monitoring key risks to biodiversity including fire, dieback, pests & diseases and climate change

    - noting the importance of baselines

    - noting the need for monitoring to precede logging operations

    - noting the importance of long-term permanent sample plots, citizen science and remotely sensed information

    - monitoring to be informed by a risk assessment for the Coastal IFOA

– monitoring based on the Coastal IFOA outcome statements.

3.2   Feedback received on stakeholder engagement processes

▪   Opportunities and timelines for stakeholder engagement need to be clarified.

▪   Ensure forest managers have a key role in the design of the Program.

▪   Provide opportunities for people with expertise to contribute, for example, through a Community Advisory Panel, comprised of persons with expertise and networks, including:

– Forest ecologists and conservation

– Forest management

– Aboriginal communities and Local Aboriginal Land Councils

– Universities, including students that can contribute to research and monitoring

– Commercial apiarists, which are an important forest-dependent industry

– Fire management

– Private property holders and experts from private industry.

▪   Ensure sufficient support is given to environmental NGOs to contribute to the Program.

▪   Provide a stronger linkage to federal programs, including the office of the Threatened Species Commissioner.

▪   Specific recommendations were provided about how to best engage Aboriginal stakeholders.

3.3   Priority information needs and evaluation questions identified

▪   Community members suggested a range of information needs either as specific evaluation questions or broad issues.

Most were associated with the Montreal criteria *maintenance of ecosystem health and vitality.*

▪   In the table below, proposed priority information needs have been summarised under the Montreal Ecologically Sustainable Forest Management (ESFM) criteria and whether the issue or evaluation question lends itself to monitoring trends over time, evaluating management effectiveness (or other evaluations in general) or implementing new research.

▪   The table below provides preliminary analysis only, and will be further updated through broader consultation with a range of stakeholders.

Note: The information priorities and evaluation questions in submissions and summary table do not represent the views of the Commission.

Community priority information needs from the Submissions			
Montreal criteria	**Monitoring trends /status**	**Evaluating effectiveness**	**Implementing research**
1. **Conservation of biological diversity** **(forest cover, growth stage, fragmentation, species and genetic diversity)**	▪ Long-term permanent sample plots ▪ Flora and fauna ▪ Area of forest by forest type and tenure ▪ Fragmentation of forest cover ▪ Urban expansion ▪ Forest structure ▪ Resilience of threatened species ▪ Threatened and endangered species in forests ▪ Disturbance to Australian biota ▪ Koala populations on state forests and nature reserve ▪ Ecological integrity of critical habitat for species	▪ What is the status and resilience of threatened species and the adequacy of protected areas to provide habitat for native animals amidst increasing threats and pressures? ▪ Is there sufficient habitat to support viable populations of native wildlife, especially threatened species? ▪ Are the Coastal IFOA prescriptions adequate in protecting habitat for native animals? ▪ What is the number of recruitment trees needed across different age groups, to maintain hollow bearing trees? ▪ How many hollow bearing trees are needed to be retained to support healthy fauna populations? ▪ How effective are the Coastal IFOA prescriptions for protecting endangered and threatened fauna? (specific IFOA Q) ▪ How effective are 10-20-50m buffers for various threatened plants? (specific IFOA Q)	▪ What are the ecological gains from transfers of state forest to the reserve system? ▪ Are forestry management techniques driving declines in species and/or ecosystem health? How effective is forest management in protecting biodiversity values and ecosystem health? ▪ What is the quality of connectivity across the landscape?
2. **Maintenance of productive capacity of forest ecosystems**	▪ Sustainable yield ▪ Extent of plantations ▪ Quantity of potential sustainable timber on private land	▪ What is the productivity of plantations? ▪ How effective is restoration in maintaining forest values?	▪ What is the capacity of forests to recover or regenerate?

Community priority information needs from the Submissions			
Montreal criteria	**Monitoring trends /status**	**Evaluating effectiveness**	**Implementing research**
	▪ Harvestable forestry area on private land ▪ Timber quantities ▪ Condition of the private forest estate and plantations		
3. **Maintenance of ecosystem health and vitality** **(Disturbance agents and processes affecting forests e.g. pests, disease, fire, climate change)**	▪ Pests and diseases ▪ Bell Miner-associate dieback ▪ Climate change ▪ Land clearing rates on private land ▪ Impacts of drought ▪ Impacts of fire ▪ Forest fuel load ▪ Air quality ▪ Long-term permanent sample plots	▪ Are forest ecosystems and biodiversity changing due to current management practices such as logging frequency, burning frequency and season of burning? ▪ Wildfire management ▪ What are the environmental impacts of logging, including of 'intensive harvesting' vs 'single tree selection'? ▪ Hollow bearing trees and recruitment trees in forestry operations ▪ What is the current extent and severity of Bell Miner-associated dieback?	▪ Ecological integrity and functionality ▪ Level of fire resilience of regrowth forest ▪ How much forest needs to be protected to prevent future extinctions and allow adaptation to climate change? ▪ What are the compounding impacts of climate change, Bell Miner-associated dieback and other pests and diseases on forests? ▪ What are the relationships between fire intensity, insect numbers and defoliation? ▪ To what extent does intensive harvesting result in increased temperatures in neighbouring forest and what are the impacts of this? ▪ How does disturbance affect flowering capacity and impact on food resources for flower and nectar-dependent species?
4. **Conservation and maintenance of soil and water resources**	▪ Water quality ▪ Silt and turbidity of regional water supplies in forested areas	▪ What are the most effective widths for riparian buffers? (specific IFOA Q) ▪ How effective are erosion mitigation prescriptions in minimising stream pollution? (specific IFOA Q)	▪ Forest contribution to water cycles ▪ Water extraction by regrowth forest

Community priority information needs from the Submissions			
Montreal criteria	**Monitoring trends /status**	**Evaluating effectiveness**	**Implementing research**
5. **Maintenance of forest contribution to global carbon cycles**	▪ Carbon storage	▪ What is the carbon storage and emissions reduction potential on state forests?	
6. **Maintenance and enhancement of long-term multiple socio-economic benefits to meet the needs of societies**	▪ Economic contribution of forestry sector ▪ Economic value of forest use ▪ Public health benefits of forests ▪ Recreation and tourism ▪ Economic value of non-wood forest products and forest-based services (honey and pollination)	▪ Is Aboriginal culture and heritage being adequately protected? ▪ Aboriginal fire and land management	▪ Social licence/extent of social tension over forestry sector ▪ Forest based ecosystem services ▪ What is the economic value of forests and their environmental services across the landscapes (including the economics of alternative uses)? ▪ How does forest management support the preservation and protection of Aboriginal culture and heritage and Aboriginal peoples use, and management of forests? ▪ What can be learnt from Aboriginal land management to improve forest management? ▪ What is the co-dependency of industries (e.g. almond industry is completely reliant on honeybees) and how do forests contribute? ▪ What are the socio-economic costs of transferring state forests to national parks?
7. **Legal, institutional and economic framework for forest conservation and sustainable management** **(Mechanisms for ESFM)**	▪ Resourcing of national parks ▪ Expenditure on forest monitoring by agency ▪ Public participation in monitoring ▪ Participation of industry groups (e.g. apiarists) in monitoring	▪ Whether best-available knowledge and adaptive management processes have been applied (are forest managers better informed)? ▪ What is the performance of the parks and reserves system in delivering biodiversity services? ▪ Is monitoring data being shared effectively and does it demonstrate links between	▪ What is the best use of state forests when accounting for alternative uses, ecosystem services and biodiversity protection obligations? ▪ Whether and how the precautionary principle has been applied in the IFOA to prevent environmental harm? (specific IFOA Question)

Community priority information needs from the Submissions			
Montreal criteria	**Monitoring trends /status**	**Evaluating effectiveness**	**Implementing research**
	▪ Adequate and equal representation of Indigenous people, forest managers and interest groups in advisory bodies and governance of monitoring ▪ Collaboration with universities ▪ Provision of information ▪ Mechanisms for accountability	management activities and outcomes for forest values? ▪ Is there trust that monitoring data will be used appropriately for adaptive management? ▪ Can agencies work effectively together on forest management, including letting go of some departmental interests and territory? ▪ Are forest policies and programs aligned?	▪ Do different management goals across different tenures require different monitoring? ▪ What are the stakeholder expectations of a monitoring program and are they being met?