



Feedback to stakeholder submissions

Forest Monitoring and Improvement Program

Response to Stakeholder feedback on draft Program Strategy

Date: 16 September 2019

The NSW Forest Monitoring Steering Committee acknowledges and thanks all of the interested stakeholders for providing submissions to the draft Program Strategy for the Forest Monitoring and Improvement Program.

The following analysis summarises how the feedback received in submissions has been addressed.

Overall, the submissions support the Program but with diverse views on how to improve the draft Program Strategy.

The non-confidential submissions have been published on the Commission's website along with the Commission's summary of the feedback received in the submissions.

The Program Strategy has been streamlined and updated to a '**Program Framework: 2019-2024**' with specific deliverables and responsibilities. The updated document is available [here](#).

Submission Feedback - How can the Program Strategy be improved?

Feedback and recommendations	Response and relevant reference in the Program Framework: 2019-2024
1. The Program should have a greater focus on the NSW Ecologically Sustainable Forest Management (ESFM) Criteria and Indicators.	Agreed. The NSW Forest Management Framework commits NSW to ESFM for all forests. In addition, the Program's terms of reference requires the Program to support Regional Forest Agreement (RFA) reporting, which includes reporting against the ESFM Criteria and Indicators. The document has been updated to include a new section on ESFM (see page 2). The Montreal Criteria and Indicators are also included in Appendix two.
2. Some submissions highlighted the need to focus on long-term monitoring.	Agreed. The Program will require investment in long-term trend monitoring. Monitoring needs to be capable of accommodating relevant timescales for forest management, including potentially longer-term timescales for biophysical changes (see page 5).
3. To be most useful, the biodiversity and conservation values of forests need to be	Agreed and noted

<p>measured over the long-term. Significant changes to the Program during its implementation could undermine its effectiveness. Where technological change allows monitoring to be undertaken in a more efficient and cost effective way it must be clear that data collected with new techniques will permit direct and ongoing comparison with historical data collection.</p>	<p>The adaptive management of the program, including through applying new research methods and technologies for monitoring is not intended to undermine the ongoing comparison of datasets.</p>
<p>4. The Program needs to have a balanced approach to the monitoring and evaluation of state forests and the conservation estate.</p>	<p>Agreed.</p> <p>The Program will deliver information to support the strategic management of forests in NSW on both public and private land. Under the terms of reference, all forests in NSW are within scope, including National Parks, State Forests, plantation forests, private native forestry, and forests on private land and crown land.</p> <p>The Program will consider the balance between tenures as the evaluation questions are prioritised (see page 5).</p>
<p>5. Include a specific focus in the Program on ensuring that Aboriginal culture, heritage and land management is protected into the future and include a performance measure on this.</p>	<p>Agreed.</p> <p>The Program Framework provides additional deliverables to address this feedback (see page 6).</p> <p>A specific Aboriginal Engagement Strategy will be developed for the Program (see page 12).</p>
<p>6. The integral relationship between Aboriginal people, forests and fire is a key reference point which needs to be formally acknowledged.</p>	<p>Agreed.</p> <p>The Program Framework provides additional deliverables to address this feedback (see page 6).</p> <p>A specific Aboriginal Engagement Strategy will be developed for the Program (see page 12).</p>
<p>7. Review data from existing monitoring programs and research in NSW and evaluate this information to inform management.</p>	<p>Agreed.</p> <p>The Program will draw on existing monitoring data, as well as any new monitoring data commissioned under the Program (see page 9).</p>
<p>8. Use triggers and thresholds, which should initiate a change in management practice.</p>	<p>Agreed.</p> <p>The Program applies the following new principle: "Performance triggers, thresholds and baselines should be employed where possible" (see page 5).</p>
<p>9. Measureable performance criteria should be used to assess all Coastal IFOA prescriptions in the Coastal IFOA monitoring program</p>	<p>Agreed, in principle.</p> <p>The Coastal IFOA monitoring program design will consider appropriate performance criteria.</p> <p>The coastal IFOA states that, in reviewing the design and timing of the monitoring program, the steering committee will need to consider the monitoring program's available budget and resources.</p>

<p>10. The Program must be designed to have scientific rigor. One test of rigor will be whether scientific results that area used to inform the program consider both positive and negative outcomes from particular management actions.</p>	<p>Agreed. One of the principles of the program is: "Best practice monitoring and research methods will be adopted to ensure the best, most scientifically robust, approach, is applied to answer the evaluation questions at hand." (page 8).</p>
<p>11. Focus monitoring on high risk locations and use an independent scientific risk assessment process to inform the design of the Coastal IFOA monitoring program.</p>	<p>Agreed. The Steering Committee has engaged CSIRO to undertake a risk-based prioritisation of the monitoring effort in the design of the Coastal IFOA monitoring program.</p>
<p>12. Review the outcome statements in the Coastal IFOA and consider what information is required to determine if those outcome statements are being achieved.</p>	<p>Agreed. The Coastal IFOA monitoring program will be designed to evaluate whether the conditions and protocols are effective in meeting the IFOA's objectives and outcomes.</p>
<p>13. The program should 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.</p>	<p>Agreed. The specific objectives of management on different tenures is now included in the Program Framework (see page 2 and Appendix one).</p>
<p>14. Reporting under the Program should be at least yearly, or preferably every 6 months to provide an update on progress and direction.</p>	<p>Agreed. Progress reports will be provided to the NSW Government at least annually and will be publically available (page 12).</p>
<p>15. The State-wide forest monitoring and evaluation plan should be finalised in 2019, instead of December 2020.</p>	<p>Agreed. The Program Framework will be established in 2019. The Program Frameworks set out a range of actions that it will roll out across the life of the program including separate plans will be developed for different components of the Program.</p>
<p>16. There should be consistent biodiversity measures across tenures, to the maximum practical extent.</p>	<p>Agreed. The Steering Committee will identify how the forest monitoring program can best align with the NSW's Biodiversity Indicator Program. The alignment of monitoring programs supports the Program's aim of being cost effective by employing efficient mechanisms.</p>
<p>17. The Program should include noting the importance of long-term permanent sample plots, citizen science and remotely sensed information</p>	<p>Agreed. Permanent plots will be a key program deliverable, as well as remotely sensed information (page 6). The Program has included an additional action to consider the role of citizen science in designing its</p>

	monitoring and research projects, corresponding to priority evaluation questions (page 7).
18. 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 tenures can be analysed consistently, and determine if forest health and condition is improving or not.	Agreed. A plot network that supports monitoring of forest condition and health across tenures is a foundational element of the program (page 6).
19. As with all citizen science processes, mechanisms will need to be put in place to ensure that stakeholder input is reliable and relevant.	Agreed.
20. Report under the Program on how its budget investment in forest monitoring is distributed and is improving forest management.	Agreed. Reporting on budget expenditure under the program will be provided through annual reports.
21. Provide a stronger focus and commitment to ensuring effective and informed reporting on Regional Forest Agreements	Agreed. A specific focus on the Regional Forest Agreements has been included in the revised document.
22. Monitoring in National Parks and plantations should be included in the Program.	Agreed. As noted in the Program's terms of reference , National Parks and plantations are within scope.
23. Monitoring funds must not be used to remap forests currently protected as old-growth or rainforest.	The budget allocation of \$7.2 million to the Forest Monitoring and Improvement Program from the Department of Industry is separate to the budget allocation for the old growth reassessment project.
24. Different landscapes may require different monitoring techniques – for example, water dependent ecosystems like the river red gums may need indicators that are not relevant to other ecosystem types.	Agreed. Methods for monitoring will be tailored to the specific landscape.
25. The Program should provide further information about how it will adapt to new information.	Agreed. Further information is provided under Aim 3 (adapt to changes in research and monitoring priorities) under the revised Program Framework.
26. The Program should identify risks of perverse outcomes from improved monitoring and address options for managing these risks.	Agreed. Monitoring outputs and research will be peer-reviewed and scientifically rigorous approaches to the interpretation and analysis of datasets will be used. In providing independent advice and recommendations, the Commission will identify any risks and options to manage.
27. While we recognise the Program needs to set priorities due to fixed resources, we do not support reductions in protections that	Noted

<p>weaken environmental outcomes (for example, using fixed logging prescriptions to justify reduced on-site monitoring before logging operations occur).</p>	
<p>28. The Program design and performance should not rely on or be limited by what these stakeholders can provide. Rather the Program must properly consider the task at hand, and design benchmarks, information requirements and outputs according to what is needed.</p>	<p>Agreed.</p> <p>The Program establishes as set of good-practice principles to guide design and implementation. In addition to stakeholders, the program will draw on scientific expert advice and literature.</p>
<p>29. Monitoring should focus on threats which pose the greatest risk to forest values. The Program should include a specific focusing the monitoring program, on:</p> <ul style="list-style-type: none"> ▪ climate change ▪ pests and weeds, such as lantana and Bell-Minor associated dieback ▪ forest fire area and intensity. 	<p>Agreed, in principle.</p> <p>The priorities for the program will be determined through an information needs assessment and a risk-based prioritisation process, as noted above.</p>
<p>30. Include ongoing economic analysis as part of the program, including economic analysis of a range of forest industries</p>	<p>Agreed, in principle.</p> <p>If economic analysis is required to answer specific evaluation questions, the Steering Committee can engage economists to support the work (see page 12).</p>
<p>31. The Program should use an online Monitoring, Evaluation, Reporting and Improvement Tool (MERIT) to upload program data about the progress of projects on a continual basis.</p>	<p>Agreed, in principle.</p> <p>The Commission team will explore the use of MERIT and other existing platforms to upload forest monitoring data such as the NSW SEED on-line portal.</p>
<p>32. Information gathered from the Program should be able to be incorporated into other environmental accounting processes including for example, State of the Environment reporting, and the NSW SEED portal.</p>	<p>Agreed, in principle.</p> <p>The monitoring data will be available for other reporting processes, such as the State of the Forests reports and State of the Environment reports.</p>
<p>33. Biodiversity values should be defined broadly and encompass not only flora and fauna, but also water quality, soil quality and carbon storage. Monitoring should therefore encompass this broad range of values.</p>	<p>Agreed</p> <p>The Montreal Criteria and Indicators are the primary framework the program will use to define the forest values; the biodiversity values under this framework encompass ecosystem diversity, species diversity and genetic diversity. However, water quality, soil quality and carbon storage are also measured under Montreal Criterion 3 and 4 (see Appendix two).</p> <p>The Program will also be drawing on the Biodiversity Indicators Program for the measurement of biodiversity values.</p>
<p>34. Any economic assessment of the value of forests must put an economic value on the</p>	<p>Agreed, in principle.</p>

<p>environmental services of landscapes and consider the economics of alternative uses.</p>	<p>Economic analysis will consider the full extent of environmental services and economic activities.</p>
<p>35. There should be a focus on ecological integrity and functionality.</p>	<p>Noted</p>
<p>36. Habitat and landscape data is preferred (rather than individual species data), however it would be appropriate to monitor some key species that are sensitive to forest management and could be indicative of broader forest health (e.g. koala, large forest owls, spotted tailed quolls). But any such landscape scale assessment should not replace assessment of local impacts at the time of logging.</p>	<p>The Program will align with the NSW Biodiversity Indicators Program where possible for the measurement of biodiversity values which includes these measures.</p> <p>IFOA monitoring program will address issues at the site scale.</p>
<p>37. Performance benchmarks need to focus on whether ESFM is being effectively delivered, rather than benchmarking against other jurisdictions or natural resources management systems.</p>	<p>Noted</p> <p>The Program Framework notes Monitoring has a greater probability of informing management where documented thresholds or benchmarks are in place.</p> <p>Performance triggers, thresholds and baselines will be employed where possible</p>
<p>38. Similarly, assessment of improvements in forest management should not be determined by forest managers but through independent reviews of whether forest management is achieving ESFM.</p>	<p>Noted</p> <p>The Commission will independently review the monitoring and research information and make recommendations to the NSW Government. Independent reviews will be peer reviewed by the expert panel and the Steering Committee.</p>
<p>39. It is difficult to see how the NRC can embark on a monitoring program without adequate base data on the current state of the forests, on the impact of the previous logging rounds under the RFAs, and the capacity of the forests to recover their ability to store carbon, contribute to the water cycles, or provide for interests other than wood supply.</p>	<p>Noted</p> <p>The Program will use existing historical forest monitoring data where possible, as well as establishing a long-term plot monitoring network across tenures.</p> <p>The responsibility is with the NRC and the broader Steering Committee to implement the Program.</p>
<p>40. The Program should not create monitoring and evaluation responsibilities that are in excess of what is currently required under legislation; the Program should not be creating another layer of bureaucracy, nor creating unwarranted costs where current legislation is inadequate.</p>	<p>Agreed</p> <p>The fourth aim of the Program is to employ cost-effective mechanisms. The Program aims to make data collection more efficient and reduce duplication in monitoring and reporting, rather than imposing additional reporting requirements.</p>
<p>41. Assist Federal Environment Minister to complete their NSW 'Koala Recovery Plan'.</p>	<p>Noted.</p> <p>The program can provide data and evidence to support the Federal Environment Minister to complete the NSW Koala Recovery Plan, if this information need is considered a priority for the Program in the prioritisation of information needs.</p>

<p>42. Most submissions considered the monitoring program was over-due, and now provides an opportunity to inform forest management. Most submissions supported monitoring to inform adaptive management.</p>	<p>Noted.</p> <p>The primary focus of the program is providing information to improve adaptive management of NSW forests. See Aim 1 – Focus on Priority Information needs (pages 5-6).</p>
<p>43. Some submissions highlight the large scope and complexity of the Program.</p>	<p>Noted.</p> <p>As noted in the Program’s terms of reference the scope of the Program covers all forests in NSW across all tenures. The Program Framework describes a clear work plan to refine the scope, as well as the responsibilities of the members of the NSW Forest Monitoring Steering Committee in design and implementation of the Program.</p> <p>The Steering Committee will monitor the program’s deliverables and the program risks, to manage the scope and complexity of the Program.</p>
<p>44. Monitoring should focus on:</p> <ul style="list-style-type: none"> • Forest growth stage and age structure, large and hollow-bearing trees • Species and habitat features most at risk from logging • Koalas and koala habitat condition • Extent and severity of Bell-miner Associated Dieback • Non-timber ecosystem services – carbon stocks and water quality and quantity. 	<p>Noted.</p> <p>These priorities are under consideration in the design of the Coastal IFOA monitoring program through a risk-based prioritisation approach, being conducted with support from CSIRO.</p>
<p>45. Monitoring should focus on:</p> <ul style="list-style-type: none"> • Presence, condition and habitat extent/condition for forest dependent threatened fauna in state forests • Water quality and quantity impacts from logging in state forests • Surveys of large (and hollow-bearing) tree density and the age structure of forests • The impact of regenerative logging and intensive harvesting • Identifying appropriate baseline data which is reflective of pre-logging ecological condition. 	<p>Noted.</p> <p>These priorities are under consideration in the design of the Coastal IFOA monitoring program through a risk-based prioritisation approach, being conducted with support from CSIRO.</p>
<p>46. Monitoring should focus on the condition of National Parks and the private forest estate.</p> <p>In particular, monitoring should focus on whether the creation of conservation reserves is preventing species extinction.</p>	<p>Noted.</p> <p>This priority will be considered in the prioritisation of information needs and evaluation questions that guide the Program’s investment in monitoring, evaluation and research.</p>

<p>47. Monitoring should prioritise public native forests subject to the Coastal IFOA; the next priority should be private lands known to be valuable habitat.</p>	<p>Noted.</p> <p>The Program is required to propose a monitoring program for the Coastal IFOA under its terms of reference.</p> <p>The priority of habitat on private lands will be considered in the prioritisation of information needs and evaluation questions that guide the Program's investment in monitoring, evaluation and research.</p>
<p>48. Performance triggers, thresholds and baselines should be employed where possible</p>	<p>Noted.</p> <p>These priorities will be considered in the prioritisation of information needs and evaluation questions that guide the Program's investment in monitoring, evaluation and research.</p>
<p>49. Consult to update measurement and monitoring of BIODIVERSITY & CARBON stocks.</p>	<p>Noted.</p> <p>This priority will be considered in the prioritisation of information needs and evaluation questions that guide the Program's investment in monitoring, evaluation and research.</p>
<p>50. Koala acoustic sensing should be used to help Aboriginal & 'citizen science' teams discover koalas before logging is scheduled.</p>	<p>Noted.</p>
<p>51. Support 'Alps-to-Coast' connectivity of diverse forest ecosystems from the 'Australian Alps' (2008) via Gippsland.</p>	<p>Noted.</p>
<p>52. The Program should assess the 'social license' to log native forests.</p>	<p>Noted.</p>
<p>53. There should be a focus on the forests of the Eden hinterland, for example, to undertake research and monitoring of the Yambulla State Forest, including on the impacts of logging over the short and longer-term.</p>	<p>Noted.</p>
<p>54. There is very little information about how the program will operate with respect to National Parks, private conservation land and Crown lands.</p>	<p>Noted.</p> <p>Following the prioritisation of evaluation questions, further details will be made available about the extent of monitoring and research under the Program in the National Parks, private conservation land and Crown lands.</p>
<p>55. Set baselines based on the condition of forests at the commencement of the Comprehensive Regional Assessments, rather than present day.</p> <p>Other submissions recommended that baselines should be set at pre-logging ecological condition.</p>	<p>Noted.</p> <p>The coastal IFOA requires monitoring to ensure the ongoing effectiveness of the approval in delivering the objectives of the approval and outcomes statements. Scientifically valid environmental baselines also need to be established to evaluate the effectiveness or impacts of the approval on the maintenance of environmental value.</p>

	Once agreed evaluation questions and metrics are established, appropriate and scientifically valid baselines will be identified. The availability, quality and comparability of existing data will be an important consideration.
56. The Program should consider breaking the review to be separate across each tenure and create different independent reviews more defined to the purpose and scope of each use.	Disagree. Some evaluations may be tenure specific, but there is likely to be a set of evaluation questions guiding the monitoring and research projects that are cross-tenure. For example, 'how is the condition of forests and associated habitats changing over time and space?' could be considered across tenures.
57. Establish a long-term goal for the forests of NSW, such as "NSW forests will be a vibrant ecosystem that is sustainable, diverse, healthy, multi-age and multi-species"	Disagree. The NSW Forest Management Framework commits NSW to deliver ESFM ESFM seeks to "maintain or increase the full suite of environmental, economic, social and cultural values of forests for current and future generations" (page 3).
58. 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.	Disagree. All forests are within scope, under the terms of reference. The NSW Government's commitment to ESFM under its NSW Forest Management Framework applies across tenures (see page 2).
59. One submission opposed the idea of delivering early projects, in parallel with finalising a state-wide plan for forest monitoring and evaluation.	Disagree. The Steering Committee has committed to deliver priority foundational projects as a building block for the Program
60. Without a transparent process for the Program, social and economic values may be afforded secondary priority (as has previously occurred under RFAs).	Noted The Program will follow transparent processes for the prioritisation of evaluation questions. A triple-bottom line approach will be taken by the Program.
61. Logging under the Coastal IFOA should be suspended until monitoring and the establishment of baseline data are complete. There should be no further logging in the Eden or Southern Region at least until it can be conclusively shown that the first RFA and earlier logging have no detrimental ecological impacts on fauna or flora.	The Program does not have the scope to make any regulatory or operational decisions regarding the suspension of harvesting.
62. Monitoring should be commenced in all high risk locations prior to any logging operations commencing in those locations. This is especially the case where the Forestry Corporation intends, under the new Coastal IFOA, to intensify logging operations and	The coastal IFOA was approved in late 2018 providing for forestry operations under approved rule sets.

<p>remove existing protections, e.g. stream buffers; threatened species habitats.</p>	<p>The Program cannot direct monitoring of the Coastal IFOA without the program being approved by EPA and DPI, as per Protocol 38 of the Coastal IFOA.</p> <p>Forestry Corporation has existing monitoring programs in place, which are continuing until the new Coastal IFOA monitoring program is approved.</p>
<p>63. Protect NSW Taxpayers by consulting before quantifying any new Wood Supply Agreement for any 'Eden Hub'.</p>	<p>The Program will not be involved in the quantification of wood supply agreements.</p>
<p>64. The Strategy violates the precautionary principle in our National Forest Policy Statement that: <i>where 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.</i></p>	<p>Disagree.</p> <p>The Program will provide additional evidence to forest managers and forest policy makers to make more informed decisions.</p>
<p>65. Proposed additional key performance indicator (medium-term): "Forest monitoring agencies report measureable improvement in forest management practices annually."</p>	<p>Noted</p> <p>Program Framework does not include KPIs. Agencies have the option to report this under the own reporting requirements.</p>
<p>66. Reviewing IFOAs is a distraction and a waste of scarce public resources and funding.</p>	<p>Disagree</p> <p>Establishing monitoring programs for the IFOAs is a requirement under the Premier's terms of reference and the coastal IFOA</p>

How can organisations within and outside of the NSW Government contribute monitoring and research on NSW forests coordinated by the Program?

Feedback and recommendations	Response and relevant reference in the Program Framework: 2019-2024
<p>1. Ensure forest managers have a key role in the design of the Program.</p>	<p>Agreed.</p> <p>Specific forest managers in NSW Government have a role on the Steering Committee and will be responsible for implementing monitoring projects, including NPWS, Crown Lands, and Forestry Corporation of NSW.</p> <p>The Steering Committee will also work closely with 'on-ground' forest managers to identify information needs, priorities and implement monitoring, research and evaluation projects. Forest managers will also be involved in the joint review of monitoring results and research outcomes.</p>
<p>2. Clarify stakeholder engagement opportunities under the Program.</p>	<p>Agreed.</p> <p>Opportunities for stakeholders to be involved in the Program through consultation meetings and forums, will be published in the Stakeholder Engagement and Communications Plan on the Commission's website. The Program will develop a specific Aboriginal Engagement Strategy.</p> <p>Stakeholders will contribute to information needs assessments, and the prioritisation of evaluation questions and monitoring needs, under the Program. Research organisations and community organisations are expected to be partners in specific monitoring and research projects. Stakeholders will be invited to annual forums to jointly review the findings and the implications for forest management in NSW (page 12).</p>
<p>3. Ensure the program engages community stakeholders in regional areas.</p>	<p>Agreed.</p>
<p>4. Ensure sufficient support is given to environmental NGOs to contribute to the Program.</p>	<p>Agreed.</p> <p>The Program will ensure sufficient support is provided to environment and community organisations to attend relevant meetings.</p>
<p>5. Provide a stronger linkage to federal programs, including the office of the Threatened Species Commissioner.</p>	<p>Agreed.</p> <p>The Australian Government is a key stakeholder in the Program. The office of the Threatened Species Commission will be consulted.</p>
<p>6. The Program must be designed so that it can operate in a scientifically independent manner that is as free as possible from</p>	<p>Agreed.</p>

<p>personal biases, emotions and agendas. To be credible the Program also needs to be kept at arm's length from direct political influence and interference.</p>	<p>The Commission provides independent advice to the NSW Government and is independently chairing the Steering Committee for the Program. Further details are available in the Governance Charter for the program on the Commission's website.</p>
<p>7. 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.</p>	<p>Agreed.</p> <p>The Program Framework provides the responsibilities of each agency and the expert panel for each program deliverable. These responsibilities build on responsibilities listed in the terms of reference for the Program.</p> <p>A Governance Charter will be published outlining the decision-making structures of the Steering Committee and working groups.</p> <p>The Coastal IFOA monitoring program will establish the agencies roles and responsibilities in the implementation of monitoring, evaluation and reporting on the Coastal IFOA.</p>
<p>8. Articulate how the NRC will hold NSW forest management agencies accountable against performance criteria.</p> <p>It is unclear how enforcement agencies may seek to enforce the program.</p>	<p>Agreed.</p> <p>Performance and accountability will be improved through increased transparency and more consistent reporting on RFAs and IFOAs.</p> <p>The Commission will provide independent recommendations to the NSW Government, which may highlight areas of performance that requires improvement. Any decision around regulatory reform, enforcement or policy changes remain the responsibility of the NSW Government and is not the responsibility of the Program or the Commission.</p>
<p>9. More detailed information should be provided on how the Program will make information publically available, and by when, in order to manage public expectations and provide some accountability to this aspect of the Program.</p>	<p>Agreed.</p> <p>Under the terms of reference and the updated Program Framework, there is a clear set of deliverables and responsibilities, outlining what information will be made available and when.</p>
<p>10. The Program Strategy does not explain how the Program will be implemented; other than to state that NSW agencies will have that responsibility.</p>	<p>Agreed.</p> <p>Under the terms of reference and the updated Program Framework, there is a clear set of deliverables and responsibilities, outlining what role the NSW agencies have in each deliverable.</p>
<p>11. The Program's commitment to transparency should be increased, including making publically available the scientific advice of independent experts.</p>	<p>Agreed.</p> <p>Any peer reviewed advice, recommendations and answers to priority evaluation questions will be made available to the public (see page 12).</p>
<p>12. Information should be made in a format that is easy for the public to understand.</p>	<p>Agreed.</p>

<p>13. Outline how will “risk, value, and cost analysis supporting decision-makers to prioritise information needs” be reported on.</p>	<p>Agreed. Program reports on risk, value and cost analysis will be published on the Commission’s website. The Coastal IFOA monitoring program’s risk assessment process, being implemented by CSIRO, will be published, for example.</p>
<p>14. Leveraging research and expertise from a broad range of stakeholders, must complement, rather than replace, the basic requirement of government or Forestry Corporation to undertake appropriate monitoring.</p>	<p>Agreed. For example, Forestry Corporation is required to implement the Monitoring Program for the Coastal IFOA and other IFOAs, once approved by the EPA.</p>
<p>15. From the publically available information, it is not clear if the Steering Committee has representatives from Forestry Corporation of NSW or from Local Land Services (LLS).</p>	<p>Noted. Both Forestry Corporation and LLS are represented on the Steering Committee (see page 11).</p>
<p>16. DPI’s Forest Science unit should have a strengthened role in the Program’s governance.</p>	<p>Noted. The Department of Primary Industries (DPI), including its Forest Science Unit already has a role on both the Steering Committee and the technical working groups. DPI’s Forest Science unit has three staff dedicated to the Program and will be delivering monitoring, evaluation and research projects under the Program.</p>
<p>17. The Program should be supported by legislation to ensure durability, and in the interim there should be an inter-departmental agreement.</p>	<p>Noted. The Commission is responding to the Premier’s terms of reference for the Program. It provides the relevant direction to the NSW Government agencies on the program and their roles over the initial Program period of 2019-2023.</p>
<p>18. One submission noted that the “Commission and Steering Committee are independent from the ongoing implementation, administration and adaptive management of the forest estate, forest policies and forest agreements”. It is unclear what is meant by this statement given that the steering committee includes representatives from a number of government agencies that are responsible for overseeing forestry management.</p>	<p>Noted. While the government agencies are members of the Steering Committee, the Steering Committee itself does not have regulatory or policy-setting role; the Steering Committee can only provide recommendations to the Government and its agencies. For example, the EPA has the responsibility for regulation of forestry operations on public lands under the <i>NSW Forestry Act 2012</i> and is responsible for the ongoing administration of the IFOAs, including adaptively managing the IFOAs.</p>
<p>19. Some submissions highlighted that forest monitoring should be undertaken independently of NSW Forestry Corporation, and Forestry Corporation should also bear the full costs of monitoring the impacts of logging.</p>	<p>Disagree. NSW Forestry Corporation is required to be a member of the NSW Forest Monitoring Steering Committee under the Program’s terms of reference and the Protocol 38 of the Coastal IFOA. In</p>

	<p>addition, FCNSW must implement and comply with the monitoring program.</p> <p>The Commission has independent oversight of the Coastal IFOA monitoring program.</p> <p>NSW Forestry Corporation is providing approximately \$6 million towards the implementation of the Coastal IFOA monitoring program in 2019-20 to 2022-23, allocated to qualified ecologists to undertake the monitoring (note: this figure excludes compliance monitoring costs).</p>
<p>20. The Program’s governance arrangements should be updated, including:</p> <ul style="list-style-type: none"> - expanding the Steering Committee to include Commonwealth representatives, industry (including apiarists), environmental conservation, community, private land holders and Aboriginal representatives (see paper 2 for further discussion) - appointing additional independent experts to the Steering Committee, in areas such as economics, fire management and private industry - establishing additional working groups and technical committees for specific issues (for example, scientific, technical, social and economic reporting groups). 	<p>Disagree.</p> <p>The Steering Committee is committed to increasing engagement with the community on the Program. The Steering Committee committed to holding regular forums with stakeholders to discuss the work of the program and receive feedback. The forums will provide opportunities for stakeholders to input to the program’s prioritisation of investment in monitoring, evaluation and research – and overtime, facilitate joint reflection and review of monitoring, evaluation and research results.</p> <p>The Steering Committee will not include any additional members on the Committee at this time.</p> <p>The Steering Committee may draw on the expertise of additional independent experts for the Program, as needed.</p> <p>There are two working groups established to date:</p> <ol style="list-style-type: none"> 1) Coastal IFOA monitoring program working group; 2) Statewide monitoring program working group. <p>The Steering Committee may establish additional working groups and committees under the Program, if needed.</p>
<p>21. Provide opportunities for people with expertise to contribute, for example, through a Community Advisory Panel, comprised of persons with expertise and networks, including:</p> <ul style="list-style-type: none"> ▪ Forest ecologists and wildlife conservation specialists ▪ 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 	<p>Disagree.</p> <p>The Steering Committee will not be establishing a Community Advisory Panel at this time.</p> <p>As noted above, stakeholders – including ecologists, forests managers, Aboriginal communities and Local Aboriginal Land councils, industry organisations, fire managers, private property holders – will be engaged through:</p> <ul style="list-style-type: none"> ▪ Information needs assessments ▪ Prioritisation of evaluation questions and monitoring needs ▪ Implementation of specific monitoring and research projects

<ul style="list-style-type: none"> ▪ Fire management ▪ Private property holders and experts from private industry 	<ul style="list-style-type: none"> ▪ Annual forums to jointly review the findings of research and monitoring and the implications for forest management.
<p>22. The Program has not enlisted the support of the Office of Environment and Heritage, which is the state's largest public forest management agency.</p>	<p>Disagree.</p> <p>The Department of Planning, Industry and Environment and the National Parks and Wildlife Service are members of the Program Steering Committee.</p>
<p>23. It is recommended that there must be consensus among representatives on the distribution of program funds and the rationale must be made public.</p>	<p>Disagree.</p> <p>As independent chair of the Steering Committee, the Commission will seek consensus on program funding allocations amongst the Steering Committee. Under the Governance Charter, the Commission is the final decision maker.</p> <p>Budget allocations under the program will be made transparent through annual reporting.</p>