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Our Ref: PFT submission NES DI

Your Ref: PFT submission NES DI

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National Environmental Standard – Data and Information

Thank you for the opportunity to provide input into the draft National Environmental Standard for Data and Information. Private Forests Tasmania (PFT) has read the draft Data and Information policy paper and corresponding draft legislative instrument and other supporting documents and can provide the following feedback.

PFT is an independent statutory authority established under the Tasmanian *Private Forests Act 1994*. We work to facilitate and expand the sustainable growth and development of the private forest resource in Tasmania. We do this through providing information to private forest growers, through research collaborations, advocacy, innovation and planning tools. Under our Corporate Plan 2026-29, one of our four goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry in Tasmania.

The Tasmanian Government has now formally advised the Australian government that it wishes to enter into a bilateral agreement that would seek to accredit the Tasmanian Forest Management System (FMS) under *part 5* of the *Environmental Protection, Biodiversity and Conservation Act 1999* (EPBC Act). Whilst it is not specifically set down in regulations, it is certain the Data and Information Standard will apply to that accreditation process.

PFT would like to raise the following matters regarding the draft Standard for Data and Information to your attention.

Recognition of systems-based environmental management

Tasmania's Forest Management System comprises three core elements of sustainable forest management:

- A comprehensive, adequate, and representative (CAR) reserve system;
- A policy for maintaining a permanent native forest estate (PNFEP); and
- Independent regulation of forestry and forest practices (Forest Practices System).

Tasmania's Forest Management System is a long-established system that delivers ecologically sustainable forest management across both public and private land. It operates at a landscape (whole of island) scale with an overarching legislative and policy framework and associated planning and operational systems. It is administered using an adaptive management and continuous improvement approach which incorporates built in monitoring and review mechanisms, stakeholder engagement, research findings and other feedback processes associated with compliance systems.

It will be important for the Australian Government when assessing Tasmania's application for accreditation, to consider the entire Forest Management System and not just the Forest Practices System – which is the Tasmanian mechanism for managing and regulating actions that potentially impact on forest related matters of national significance.

It is equally important that the Australian Government consider a broader view of application as the current Data and Information Standard is written in a format and language that is more applicable to individual project by project assessments and decision-making, rather than landscape scale system wide assessments that the Tasmanian Forest Management System facilitates and supports. Under the Tasmanian Forest Management System, data and information about environmental matters is collected, validated and utilised over time to best assess trends and accurately represent environmental outcomes in managed forest systems, and furthermore to enable ongoing improvement to respond to new scientific knowledge.

Older datasets covering landscape scale data and information

Tasmania's Forest Management System and management of the environment is based on scientifically robust and fit for purpose datasets covering forest inventory, biodiversity, species and threatened species observations, yield predictions, and regeneration and reforestation.

These datasets have been collected, quantified and refined over extensive time periods and remain factual and fit for purpose under the landscape scale system of forest management in Tasmania despite their age. They are used consistently as part of environmental decision-making processes and to inform operational planning and support cumulative conservation outcomes over a period of time.

The draft Data and Information Standard post-dates these datasets and does make them – despite their continued use and suitability – aged. In addition, the draft Standard (Principle 2 – Transparent data and information) outlines *adequate metadata*, which should be acknowledged is not consistent across existing datasets used currently as part of decision making under the Forest Management System. In addition, it is likely that parts of these datasets may not be consistent with current data collection processes outlined in the Standard.

It will be important to understand how the Standard would consider aging datasets like the ones utilised in Tasmania’s Forest Management System, as it could impact the validity of decision making based on data and information if these datasets were to be retired or instructed to be redeveloped/established.

Acknowledging scientific processes and data and information collection

The draft Data and Information Standard is written and structured in a way that assumes data and information collection methods (in relation to environmental impact assessments) are scientifically robust, project based and representative of moments in time. The reality is that Tasmania’s Forest Management System and decision-making processes are different.

When considering the types of data and information collected on environmental matters, it would also be pertinent to acknowledge that science – most notably in a native forest context – is highly contested. Despite significant research (including data and information collection) over many decades, credible scientists sometimes have very different views on whether a development or activity (in this context – forest management or operational activities) have impact that is significant on matters of national environmental significance. The draft Standard for Data and Information, of which covers data and information on forest management and matters of national environmental significance, is unconsidered if it sets an expectation that impact can be identified, quantified using data or information collected from an individual action or activity when the science is often contested or conflicting. For example, is all

observation data considered to be of the same standing? At times, there is observation data on threatened species collected through both robust and statistically credible methods (for example, scientific trials), and other observation data collected with uncredible methods or no methods at all. The draft Standard should clearly articulate the parameters around scientifically robust data collection to avoid decision-making based on data which cannot be verified.

In addition, the draft Standard notes that data and information collected should be from *authoritative sources*. Some of the current datasets used for decision making under the Tasmanian Forest Management system are sometimes collected and utilised by the same sources. The Standard, although acknowledging a process for no authoritative sources, does not appear to provide information or clarity for a situation whereby the data is collected and used by the same source, nor if there are multiple sources which claim to have verified data which could be conflicting. If the Standard were to not recognise the existing Forest Management system as an authoritative source, it could mean that decision making could be inefficient, or authoritative sources could be providing conflicting information.

Principles based assessment (clause 7)

PFT supports the addition of the new subsection (new clause 7) in the draft Standard that provides an action or class of actions that satisfies the principles is considered to satisfy the outcomes and the objectives of the Standard - and therefore be consistent with the Standard as a whole. This is a sensible and practical amendment over the first version of the Standard as the more prescriptive principles provide better guidance for proponents as to how their proposals can meet, and therefore achieve, the outcomes and objectives.

Ultimately, Private Forests Tasmania supports the intent of the draft National Environmental Standard for Data and Information and can appreciate how the objectives of the Standard support quality, transparent and consistent data and information processes to support environmental decision making. However, PFT would appreciate further clarity on the matters mentioned above to support effective implementation of the Standard whilst upholding the sanctity of the Tasmanian Forest Management System and the level of support current data and information provides to environmental decision making.

If you have any queries on the points we have raised, please contact me on [REDACTED] or our Policy & Data Officer Murray Root on [REDACTED]

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Pietrzykowski', written in a cursive style.

Dr Elizabeth Pietrzykowski
CEO Private Forests Tasmania