

Submission Number: NND.001.00958

Submission Of: Peter Cosier

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Preferred means of contact: Email

What is your submission based on? I am making this submission based on my professional knowledge, qualifications or experience or on behalf of a group or organisation

What is your area of professional expertise?

If you are lodging your submission on behalf of a group or organisation, what is the name of the group or organisation? Accounting for Nature Ltd

Your Submission

In your experience, what areas of the bushfire emergency response worked well?

No comment.

In your experience, what areas of the bushfire emergency response didn't work well?

No comment.

In your experience, what needs to change to improve arrangements for preparation, mitigation, response and recovery coordination for national natural disaster arrangements in Australia?

A key aspect of effective natural disaster management, including reducing the impacts of natural disasters, is high quality information to support decision making. Information can be used to guide decisions about preparing for natural disasters, as well as decisions about managing the impacts of disasters after they occur.

If you can't measure it, you can't manage it.

Natural disasters, such as the bushfires experienced in the summer of 2019-20, can have profound environmental impacts. At the forefront of these is impacts on ecologies and biodiversity. In the 2019-20 fires, seventeen million hectares of land was burned, much of it of environmental significance. Thirty-seven of Australia's 84 threatened ecological communities were impacted by the fires, with seven having had more than 30 percent of their estimated distribution within the fire extent. Conservative estimates, based on NSW and Victoria only, project losses of over one billion mammals, birds and reptiles combined. Ecosystems provide a wide range of provisioning, regulating and cultural services to the Australian economy, and the bushfires would have had a deleterious impact on the supply of these services.

While some information exists on the state of Australia's environment, it is often piecemeal, lacking in system and comparability and only available at particular scales, or for certain geographies, or for discrete environmental assets. Australia lacks comprehensive information on the condition of its environment. Governments and citizens need user-friendly, scientifically-credible and cost-effective measures on environmental condition at multiple scales to inform their decisions about the environment. Importantly, these measures need to be available at and standardised across both different geographic scales (eg national park, regional ecosystem, natural resource management region, state, national) and different types of environmental assets.

Up until recently, there was a lack of a methodological framework to develop such measures. However, in recent times, the United Nations has developed the concept of ecosystem accounting, which seeks to provide a coherent, systematic, integrated and comprehensive framework for ecosystem accounting, of which environmental condition is a key component. Drawing from this, Accounting for Nature has developed an open-source, scientifically-robust Framework that can be used to measure environmental condition and produce environmental condition accounts at all levels of scale and across all types of environmental assets.

As it is not possible to predict where the next natural disaster might hit, environmental condition accounts covering all of Australia are required. It would be inconceivable for policy makers dealing with economic shocks not to have robust information such as the national accounts and other key economic statistics to assist them, just as it would be inconceivable to envisage that policy makers dealing with health crises not to have high quality health and broader social and demographic information to inform their decision. Australia's policy-response to the current Coronavirus crises is strong evidence of the need for high quality information to underpin decision making. It should be equally inconceivable that policy makers dealing with natural disasters that have significant environmental impacts not to have comprehensive and high-quality information about the condition of the environment.

Knowing the condition of the environment can help decision makers dealing with natural disasters in several ways, including:

- identifying areas of high environmental value so that natural disaster preparedness can focus on these areas to mitigate the potential impact of disasters
- providing systematic and comparable information about the impact of natural disasters on environmental assets to assist in the evaluation of natural disasters and natural disaster management
- identifying areas of significant environmental damage for assigning priority for repair
- providing a mechanism for monitoring improvement in condition following post-disaster recovery efforts
- enabling the economic and social impacts arising from the change in environmental condition due to natural disasters to be assessed by linking environmental and socio-economic information.

Of course, it is not just governments who have a role in managing disasters. Many other stakeholders, such as land managers and Indigenous

communities, have a direct interest in effective environmental management. Increasingly, markets are opening up for investment in environmental condition, so these investors also have stake. But the ultimate beneficiary of effective environmental management, including environmental management related to natural disasters, are the people of Australia, whose well-being depends on a sustainable environment. Accordingly, all of these stakeholder groups would benefit enormously from the information that would be provided by a national set of environmental condition accounts.

It is worth noting that environmental accounts provide broader benefits to environmental-decision makers beyond decisions associated with natural disasters.

We respectfully urge the Royal Commission to find that comprehensive environmental condition accounts for Australia are an essential requirement to underpin 'what actions should be taken to mitigate the impacts of natural disasters', as one of the matters that the Commission is authorised to enquire into.

Is there anything else you would like to tell the Royal Commission?

Accounting for Nature Ltd is a not-for-profit company with a vision to be a recognized global leader for measuring changes in the health of the environment. Our mission is to provide transparent, affordable and verifiable measures of change in environmental condition, of sufficient quality to inform policy and investment decisions – both at an enterprise and at an ecosystem scale.

We would be pleased to elaborate on this submission or provide further information if the Commissioners would find this helpful.

This submission has been provided on behalf of the AfN Ltd Board:

[Redacted signature block]

Do you agree to your submission being published? Yes I agree to my submission being published in my name

Supporting material provided:

200428 AfN submission to the Royal Commission into National Natural Disaster Arrangements.pdf

27 April 2020

Dear Commissioners,

Thank you for the opportunity to provide a submission to the Royal Commission into National Natural Disaster Arrangements.

A key aspect of effective natural disaster management, including reducing the impacts of natural disasters, is high quality information to support decision making. Information can be used to guide decisions about preparing for natural disasters, as well as decisions about managing the impacts of disasters after they occur.

If you can't measure it, you can't manage it.

Natural disasters, such as the bushfires experienced in the summer of 2019-20, can have profound environmental impacts. At the forefront of these is impacts on ecologies and biodiversity. In the 2019-20 fires, seventeen million hectares of land was burned¹, much of it of environmental significance. 37 of Australia's 84 threatened ecological communities were impacted by the fires, with seven having had more than 30 percent of their estimated distribution within the fire extent.² Conservative estimates, based on NSW and Victoria only, project losses of over one billion mammals, birds and reptiles combined.³ Ecosystems provide a wide range of provisioning, regulating and cultural services to the Australian economy, and the bushfires would have had a deleterious impact on the supply of these services.

While some information exists on the state of Australia's environment, it is often piecemeal, lacking in system and comparability and only available at particular scales, or for certain geographies, or for discrete environmental assets. Australia lacks comprehensive information on the condition of its environment.⁴ Governments and citizens need user-friendly, scientifically-credible and cost-effective measures on environmental condition at multiple scales to inform their decisions about the environment. Importantly, these measures need to be available at and standardised across both different geographic scales (e.g. national park, regional ecosystem, natural resource management region, state, national) and different types of environmental assets.

Up until recently, there was a lack of a methodological framework to develop such measures. However, in recent times, the United Nations has developed the concept of ecosystem accounting, which seeks to provide a coherent, systematic, integrated and comprehensive framework for ecosystem accounting, of which environmental condition is a key component.⁵ Drawing from this, Accounting for Nature has developed an open-source, scientifically-robust Framework that can be used to measure environmental condition and produce environmental condition accounts at all levels of scale and across all types of environmental assets.⁶

As it is not possible to predict where the next natural disaster might hit, environmental condition accounts covering all of Australia are required. It would be inconceivable for policy makers dealing with economic shocks not to have robust information such as the national accounts and other key economic statistics to assist them, just as it would be inconceivable to envisage that policy makers dealing with health crises not to have high quality health and broader social and demographic information to inform their decision. Australia's policy-response to the current Coronavirus crises is strong evidence of the need for high quality information to underpin decision making.

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Submission to the Royal Commission into National Natural Disaster Arrangements

Knowing the condition of the environment can help decision makers dealing with natural disasters in several ways, including:

- Identifying areas of high environmental value so that natural disaster preparedness can focus on these areas to mitigate the potential impact of disasters;
- Providing systematic and comparable information about the impact of natural disasters on environmental assets to assist in the evaluation of natural disasters and natural disaster management;
- Identifying areas of significant environmental damage for assigning priority for repair;
- Providing a mechanism for monitoring improvement in condition following post-disaster recovery efforts; and,
- Enabling the economic and social impacts arising from the change in environmental condition due to natural disasters to be assessed by linking environmental and socio-economic information.

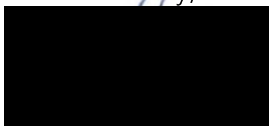
Of course, it is not just governments who have a role in managing disasters. Many other stakeholders, such as land managers and Indigenous communities, have a direct interest in effective environmental management. Increasingly, markets are opening up for investment in environmental condition, so these investors also have stake. But the ultimate beneficiary of effective environmental management, including environmental management related to natural disasters, are the people of Australia, whose well-being depends on a sustainable environment. Accordingly, all of these stakeholder groups would benefit enormously from the information that would be provided by a national set of environmental condition accounts.

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We respectfully urge the Royal Commission to find that comprehensive environmental condition accounts for Australia are an essential requirement to underpin 'what actions should be taken to mitigate the impacts of natural disasters', as one of the matters that the Commission is authorised to enquire into.⁷

We would be pleased to elaborate on this submission or provide further information if the Commissioners would find this helpful. We would be pleased for this submission to be made publicly available by the Royal Commission.

Yours sincerely,



Mr Peter Cosier







Chair

Accounting for Nature Limited Ltd

Email: 

Telephone: 

On behalf of the Accounting for Nature Ltd Board of Directors:

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About Accounting for Nature Ltd

Incorporated in early 2019 as a not-for-profit organisation, Accounting for Nature Ltd's vision is for Australia to become a global leader for measuring changes in the health of the environment. This vision will be achieved when every farm, every conservation reserve, every fishery, every forest, every region, every nation has access to an affordable, scientifically robust way of measuring, verifying and certifying changes in the condition of their environmental assets.

This vision will be achieved through the Accounting for Nature[®] Framework - the first globally consistent, scientifically credible Standard for measuring, certifying and communicating changes in the condition of environmental assets – be these native vegetation, soils, fauna, freshwater or marine ecosystems. Importantly, the Framework establishes the Econd[™] as a simple yet scientifically robust index to communicate changes in environmental condition over-time.

In achieving this vision, Accounting for Nature Ltd will unlock billions of dollars globally for sustainable/regenerative agriculture and conservation. Accounting for Nature Ltd is already catalysing public and private investment.

¹ Australasian Fire and Emergency Service Authorities Council
<https://twitter.com/AFACnews/status/1233262259612213248/photo/1>

² Department of Agriculture, Water and Environment <http://www.environment.gov.au/biodiversity/bushfire-recovery/research-and-resources>

³ Australian Parliamentary Library
https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp1920/Quick_Guides/AustralianBushfires

⁴ The 2016 *State of the Environment* report found that 'data and long-term monitoring [of the environment] are inadequate'. Similar findings were made in previous *State of the Environment* reports.

⁵ Ecosystem accounting is a subset of the United Nations *System of Environmental-Economic Accounting (SEEA)*. SEEA accounts are a structured, systematic way of organizing environmental and other data into information for a decision-making purpose. They present comparable information in a systematic fashion, using standard definitions based on a sound conceptual framework. Accounts encourage the development of comprehensive and consistent data and provide a platform for producing a range of reports and analyses. They also provide a mechanism for integrating environmental, economic and social information so that the economy's impact on the environment and vice-versa can be understood.

⁶ Under the auspices of the Wentworth Group of Concerned Scientists, the Accounting for Nature framework was trialled in 10 Natural Resource Management Areas. Information on the trials, including Technical and Evaluation Reports, can be found at <https://wentworthgroup.org/programs/environmental-accounts>

⁷ Commonwealth Letters Patent – 20 February, 2020