PSA Additional Feedback

- Members are concerned about conflicting information shared by CEO's office vs. executives, i.e., proposed model is or is not set in stone. Members have explicitly been told by an ELT member that those who have been identified as impacted will remain impacted following consultation, and those who have been identified as not impacted will remain so, too. This contradicts statements from the CEO and the inherent requirement of genuine consultation that the feedback provided can alter the outcome.
- WHS issues:
    - Span of control while managing staff in the field. Some EO14s may now be expected to manage <14 staff. This poses a significant risk to staff safety.
    - Members have raised concerns directly with HR about risks to the psychosocial safety of staff over the shutdown period. These members have been told by HR that this is a non-issue. Members feel their concerns are not being heard and are disheartened about continuing dialogue with the EPA.
    - Members have raised concerns about experiences with the EAP, with a number of staff indicating they do not feel safe accessing it as a service, with some lodging a CAMMS report
- Members request actual figures of demographics directly impacted, rather than percentages. If this is not actionable, members request an explanation of the percentage base, i.e., is it percentage of structure pre-proposal, or post removal of positions that have been tentatively declared excess from the structure.
- All directly impacted staff need clearer, quantifiable expectations for their performance of 'meaningful work' once declared excess. What percentage of daily or weekly working hours are staff allowed to spend seeking employment? Being on the mobility process should carry different performance expectations than being employed in a full-time, ongoing role. This is a particularly impactful issue for people leaders who are responsible for the wellbeing of staff.
- Staff have been offered 'one-on-one' meetings with Tony to share feedback about the restructure. Upon receiving a meeting invitation for these meetings, staff are faced with the expected attendance of their Executive Director, as well as Tony. This does not engender dialogue in good faith.
- Members are seeking an explanation for disrespectful and disingenuous practice by HR, practice that conflicts with the organisation's professed commitment to transparency and fair consultation. Specifically, not allowing time for verbal Q&As at the end of HR-led meetings about the restructure, ending these meetings before their allocated duration and turning off the chat function of these meetings.
- How will the mobility process comply with the right to disconnect per Fair Work legislation? Will staff who are on leave during the mobility process be paid disturbance allowances when required to be available for mobility matching matters?
- Staff are receiving emails stating initial role matching is occurring from today, 20th November, less than one day after the consultation period has closed and well before the final outcome of the consultation process.
- There are new roles created which appear to be the same as nominally delimited roles simply retitled, such as Coordinator Risk & Governance Investigations

- EO12 Compliance Program Coordinator roles should be retained in each of the regions to restore strategic leadership, support consistent delivery of compliance programs, and maintain internal expertise across the EPA. The role's core functions—planning targeted programs, mentoring staff, managing complex stakeholder relationships, and contributing to strategic regulatory outcomes—are essential in all regions. Embedding EO12s across

branches ensures that local risks are addressed with tailored, expert-led responses, while maintaining statewide consistency. Rather than centralising expertise in one branch, a distributed model allows each region to benefit from senior coordination, especially as field teams face increased cognitive load and reduced capacity. This approach also supports succession planning, staff development, and operational resilience.

- Currently, there are 4 Integrated Forestry Operations Approvals (IFOAs) and 4 Private Native Forestry (PNF) Codes of Practice state-wide. The Coastal IFOA alone has 97 harvesting operations either active, approved, or planned. Across all IFOAs, there are 41 active operations in Coastal (20 high risk), 24 in Brigalow Nandewar, 24 in South Western Cypress, and 18 in River Redgum. State-wide, there are 4160 PNF approvals, with 300 new approvals in the 2024/25 year and 235 commencing harvest this calendar year.
- In the North Coast Branch, there are 56 IFOA operations and 3012 PNF approvals. By LGA: Port Macquarie services 1189 PNF approvals, Coffs Harbour 579, and Grafton 1244.
- The Forestry Specialised Regulation team is proposed to include one EO12 and five operations officers. It is assumed that fieldwork for the 4160 PNF and 4 IFOAs will still involve field ops staff. However, the proposed model does not adequately resource the Forestry team, nor the halved North Coast field ops teams, which lack the capacity and expertise to support the field component of forestry regulation.
- Additionally, the new Forestry Specialised Regulation team is expected to absorb responsibilities previously handled by the Forestry Coordination Unit—such as inter-agency work, ministerials, and risk assessments—further stretching its capacity.
- Given the cognitive load and geographic demands on field ops staff, more consideration is needed for the concentration of forestry activity in the North Coast. Clear expectations must be set around the level of forestry expertise required and retained by field staff. Furthermore, clarification is needed on the extent of fieldwork expected from the specialised regulation team state-wide.
- The 2019 structure had significantly more operational and support staff than the proposed model. It included 16 operational staff and 2 people leaders. The scale of forestry work has not decreased—if anything, it has intensified. The proposed staffing is insufficient to meet regulatory obligations. A return to or adaptation of the older structure is necessary for success. Success depends on defining what field work the specialised regulation team will do state-wide, what forestry knowledge and skills field ops staff are expected to retain and how workload will be balanced across regions with high forestry activity (e.g. North Coast).
- Regional field capacity for forestry generally needs to be a focus with staff resourced accordingly. Dedicating existing forestry expertise, and new unskilled staff to this role and embedding across regional offices where forestry is concentrated will ensure geographic coverage for inspections and compliance, retain and build local knowledge and relationships and reduce travel and response times.
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- The deletion of 3 out of 5 positions in the Environment Line presents a significant operational risk. With only 2 staff, if either person takes leave for any reason, there will be only 1 staff member.
- Suggestion that the EPA coordinates with other agencies in the DCCEEW cluster to open up EOIs for staff who are directly impacted - even before the mobility pool activation.
- In the OCU team
    - Deletion of EO 12 role in the team - this will impede the function of the team through the removal of a highly-experienced and valuable employee, with a resultant loss to the organisation in terms of corporate and operation knowledge.

The manger role will be partially degraded to an EO 12 because of delegations for important aspects of licensing and other functions relying on EO 12 sign off. EO 14 will also be managing other day-to-day tasks previously done by the EO 12 such as leave and timesheets.

  - Deletion of one EO10 and one EO8 position - This reduces redundancy in the team for these two key roles. Removal of the EO12 will create a heavy reliance on the single EO10 and EO8 and increased workload for less experienced officers. The new structure will make it difficult for EO 8 and EO 10 to take leave due to increased workload and no alternative EO10 or EO8. There is a significant risk of overload and burnout to officers in the EO8 and EO10 positions.
  - Acting up assignments and career progression - there is no clear role progression for the EO10 position with the removal of the EO12 from the structure. Acting up roles will be diminished for lower grades, for example it is difficult to see the EO10 jumping grades to act in the EO 14 role as manager.
  - Removal of administrative roles in the team – the EO 7 and EO 3 roles have been deleted. These positions are vital to team function.
  - Loss of morale - there is loss of morale being felt by the team and in the EPA in general. There has been a general disheartenment caused by the shock of job cuts. In particular, the reason for the wholesale deletion of EO12 positions is difficult to understand given the importance of this role and the level of experience held by the staff who have been affected.
  - Some members suggested Finance be moved from the Policy area to Legal with People and Culture in response to the current budget problems for decisions to be made with full knowledge from both areas by a single decision-maker and ensure staffing decisions are made within budget constraints. This may also streamline Cabinet processes in LG&P

- CMP makes reference to the consideration of impacts on Equal Employment Opportunity groups, staff with special needs, and on rural communities, but there is no reference to the EPA's responsibilities for consultation with carers under the Carers (Recognition) Act 2010