

**Submission on the draft Forest Management Plan 2014 – 2023**  
**WA Forest Alliance City West Lotteries House 2 Delhi Street, West Perth 6005**  
Prepared by Beth Schultz [beth.schultz@amnet.net.au](mailto:beth.schultz@amnet.net.au) November 2012

**Recommendation** Because of climate change, especially decreasing rainfall, and the impacts of pests and diseases, especially increasing numbers of fungal pathogens, forest that is logged now will not regrow to its present size, health and structure so logging cannot be sustainable. All logging of native forest must stop as quickly as possible with the phase out commencing immediately through a staged reduction in the allowable cut.

## **1. The draft Forest Management Plan cannot deliver ESFM.**

Section 19 of the *Conservation and Land Management act 1984* requires the Conservation Commission to advise the Minister for Environment on the application of the principles of ecologically sustainable forest management (ESFM), as defined in the Act, in the management of State Forest and on the production and ‘harvesting’ of forest produce on a sustained yield basis. The Commission’s draft Forest Management Plan (DFMP) does not comply with either of these requirements and should be rewritten so that it does.

### **1.1 Biological diversity**

1.1.1 Logging and burning are the main disturbances in our forests, which are the last refuge for increasing numbers of endangered species of birds (the three species of cockatoos) and mammals (numbats, woylies, Western ringtail possums). Six fauna species have moved to a higher category of threat under the current FMP.<sup>1</sup> Continued logging risks driving these and other species closer to local and total extinction.

**Recommendation** In light of the number of fauna species that use forests as their last refuge and are threatened by loss of habitat and the number that has moved closer to extinction since the current FMP came into operation in 2004, the continuing destruction of fauna habitat through logging and frequent extensive burning must stop as quickly as possible.

1.1.2 It is proposed to add 2,370 ha to the Whicher National Park (p. 10 and passim). This action is long overdue and should be implemented as quickly as possible.

**Recommendation** The area of Whicher National Park should be increased as proposed and the necessary legislation passed as quickly as possible.

1.1.3 There is a proposal to reduce the area of forest in travel routes while adding a zone along the Munda Biddi Trail and round its campsites (p. 11 and passim). All this forest is needed to provide connectivity essential to maintain biodiversity and amenity for recreationists and tourists.

**Recommendation** Should any native forest logging be permitted under the next FMP, the current travel routes should be maintained and the routes proposed for the Munda Biddi Trail should also be provided.

1.1.4 There is a proposal to reduce the total area of fauna habitat zones (FHZs) from 52,673 ha to 44,244 ha and the area of each FHZ from 200 ha to 100 ha (pp. 44-45). There are no supporting data to show that a 100 ha FHZ is large enough to support and maintain biodiversity until the adjacent logged forest provides pre-logging habitat. Nor is there any scientific justification for the reduction in the total area of FHZs.

**Recommendation** Should any native forest logging be permitted under the next FMP, the current provisions for fauna habitat zones (FHZs) should be retained with no reduction in total area or in the area of each FHZ.

1.1.3 The DFMP expresses a misplaced reliance on ForestCheck (p. 12 and passim). Because of the absence of pre-disturbance base-line data, its short duration and flawed methodology ForestCheck does not show, nor could it show, that no species has been lost from our forests because of logging and burning or that logging and burning have no adverse impacts on forest biodiversity.<sup>2</sup> Such claims should not be made in an attempt to justify continued logging. For a critique of ForestCheck, see Appendix 1.

**Recommendation** Reliance should not be placed on ForestCheck because it does not show, nor could it show, that no species has been lost from our forests because of logging and burning or that logging and burning have not had, and will not have, any adverse impacts on forest biodiversity

1.1.4 There are proposals to transfer the administration of the public nomination process of old growth forest from the Conservation Commission to DEC or to discontinue it altogether (p. 36). This is not acceptable.

**Recommendation** Should any native forest logging be permitted under the next FMP, the area of old growth forest as currently identified should be retained and community members should continue to be allowed to nominate potential old growth forest to the Conservation Commission for assessment. This assessment should be conducted in a timely and rigorous manner with the full participation of the community.

1.1.6 The definition of old growth jarrah forest excludes even unlogged forest if it is considered to be 'affected' by Phytophthora dieback. There is no definition of 'affected' and no community involvement in the decision on the definition.

**Recommendation** The definition of old growth jarrah forest should not exclude forest 'affected' by Phytophthora dieback unless it is 'significantly affected'.

## 1.2 Ecosystem health and vitality

1.2.1 All our south-west forests are in decline because of:

- climate change bringing
  - ◇ decreased rainfall.
  - ◇ Increased number and intensity of frosts
  - ◇ more rain during summer, when it increases the range and growing time of Phytophthora dieback
  - ◇ increased frequency and severity of insect pest attacks.

- *Phytophthora cinnamomi* and other species of Phytophthora, which are attacking more and more plant species
- the fungus *Armillaria luteobubalina*, which is invading karri regrowth and, with other fungi, is degrading the wood and making it unsuitable for sawn timber
- the fungus *Quambalaria coyrecup*, which is killing marri trees of all ages and in all land tenures and categories
- the fungus *Quambalaria piterika*, which is attacking marri blossom and nuts, with disastrous consequences for cockatoos and honey producers.

**Recommendation Because of climate change, especially decreasing rainfall, and the impacts of pests and diseases, especially increasing numbers of fungal pathogens, forest that is logged now will not regrow to its present size, health and structure so logging of native forest must stop as quickly as possible.**

1.2.2 DEC'S fire management is not protecting property or biodiversity. The fire management branch ignores the wealth of scientific evidence that challenges the assumptions on which its fire management policy and practices are based. For references on this issue, see Appendix 2.

**Recommendation In order to protect and maintain biodiversity, ecosystem health and vitality in our forests and other community assets (e.g., property), fire management should be entrusted to independent ecologists and wildfire risk assessors.**

### 1.3 Soil and water

1.3.1 DEC research shows that logging compacts the soil in 12 per cent of the area logged and the soil will not recover for at least 50 years.<sup>3</sup> This means that some 72,000 ha of the 600,000 plus ha of forest logged in the past 50 years will still be suffering from soil compaction. Another 10 years of logging at approximately 10,000 ha a year would increase the impacted area by 12,000 ha. With most logging now being done by machine, this problem can only get worse.

1.3.2 The proposal to kill trees and understorey vegetation in an attempt to increase run-off into streams and dams ('silviculture for ecosystem health', p. 13 and passim, 'silviculture for water production', p. 13 and passim) cannot prevent the inevitable consequences of climate change and would only increase environmental damage in our forests by for example removing even more mature trees with nesting hollows and spreading dieback.

1.3.3 Given that the Water Corporation no longer regards surface water as a potential source of water, DEC should not consider killing trees in an attempt to increase run-off. It is clear that what is being proposed is simply another excuse to continue logging, not a scientifically credible response to climate change.

1.3.4 The amount of glyphosate required to kill trees and understorey species to a basal level of 8 to 10 m<sup>2</sup> per hectare<sup>4</sup> (p. 76) and the risk of spills in water catchments strongly militate against implementation of this proposal.

**Recommendation The proposal to kill trees and understorey vegetation to increase run-off into streams and dams using glyphosate or any other method ('silviculture for ecosystem health,' 'silviculture for water production') must be rejected.**

#### **1.4 Climate change and carbon cycles**

1.4.1 The DFMP contains alarming expressions of skepticism about climate change and its impacts.<sup>5</sup>

1.4.2 In spite of the admission that rainfall has declined since the mid 1970s (p. 83), out-of-date rainfall data have been used throughout the DFMP,<sup>6</sup> making all the calculations and projections unreliable.

**Recommendation If the next FMP is to have any credibility, up-to-date rainfall data must be used for all calculations and projections.**

1.4.3 Our forests store large amounts of carbon in the trees, understorey, litter and soil. This carbon is released by logging and burning and will not be recaptured for decades, possibly centuries. Authoritative peer reviewed studies have shown that logging with regeneration burning is a large net greenhouse gas emitter when the loss of both vegetative and soil carbon and the full end use of extracted wood are accounted for.

**Recommendation There needs to be an independent assessment of the carbon storage capacity of south-west native forests and the impacts on carbon storage of logging and burning.**

#### **1.5 Productive capacity**

1.5.1 Logging of native forests is unsustainable. Trees being logged now will not regrow to their former size and structure because rainfall has decreased by 15 per cent since the mid 1970s (p. 83) and the models for climate change in the South-West indicate rainfall will continue to decrease by up to 60 per cent (p. 83).

1.5.2 The quantity of 1<sup>st</sup> and 2<sup>nd</sup> grade jarrah and karri sawlogs has declined considerably since 2004 (see Appendix 3). There aren't enough good quality sawlogs to keep the native forest sawmilling industry going, so producing sawn timber is no longer a justification for continuing to log our native forests.

1.5.3 Based on sawn timber recovery rates given by the Forest Products Commission, as little as 15 per cent of the wood from the native forest logs sold by the FPC becomes sawn timber, and this includes hundreds of thousands of timber railway sleepers (see Appendix 4). The figures for 1<sup>st</sup> and 2<sup>nd</sup> grade karri sawlogs are based on a recovery rate of 43 per cent. However, reports from sawmillers say that the recovery rate for what the FPC is selling as 1<sup>st</sup> and 2<sup>nd</sup> grade sawlogs is not 43 per cent but as low as 28 per cent.

1.5.4 The use of furniture quality jarrah for railways sleepers is completely unacceptable and must be stopped. Sleepers can and should be made of concrete.

1.5.5 Most native forest logs are of too low quality to go to sawmills and go directly to the woodchip mill (karri) or to commercial firewood merchants and Simcoa (jarrah). Woodchips, firewood and charcoal are not acceptable uses for our native forest trees (see Appendix 4).

**Recommendation Because of climate change, especially decreasing rainfall, and the impacts of pests and diseases, especially increasing numbers of fungal pathogens, forest that is logged now will not regrow to its present size, health and structure so logging cannot be sustainable. All logging of native forest must stop as quickly as possible with the phase out commencing immediately through a staged reduction in the allowable cut.**

1.5.6 Markets are being sought for very large amounts of low-grade logs just to keep a native forest logging industry going. That is no justification for continuing to log our forests.

1.5.7 The Government is considering selling native forest logs to be burnt to produce electricity as another way to prop up the non-viable native forest logging industry. This is a completely unacceptable use of our forests and must be prohibited.

**Recommendation For the reasons listed above, proposals in the DFMP to continue and even increase native forest logging must be rejected.**

1.5.8 It is proposed to conduct 'salvage logging' of trees killed by drought or dieback (p. 7 and passim). Scientific research has shown that salvage logging can have profound negative impacts on ecological processes and biodiversity and will rarely, if ever, contribute in a direct or positive way to ecological recovery.<sup>7</sup> There appear to be no references about salvage logging in the list on pages 273 – 282 of the DFMP.

**Recommendation Because of the ecological damage it causes and its failure to contribute to ecological recovery, salvage logging should not be conducted.**

1.5.9 In areas to be rehabilitated it is proposed that seeds of plants that do not naturally grow there may be used. This proposal needs far wider consideration than a couple of paragraphs in the DFMP and the involvement of only DEC and the Conservation Commission.

**Recommendation Before any decision is made on whether to use seed from sources other than the area to be rehabilitated there must be a full assessment of the proposal by an independent panel with full public involvement.**

## **1.6. Heritage**

1.6.1 Recent amendments to the CALM Act require that in preparing a proposed management plan for any land, the responsible body for the land shall have the objectives of (a) protecting and conserving the value of the land for the culture and heritage of Aboriginal persons, in particular from any material adverse effect caused by the taking or removal of the land's fauna, flora or forest produce (Section 56 (2) CALM Act). Since the next FMP as proposed would involve the removal of large quantities of forest produce, the killing of wildlife and the destruction of heritage sites, there must be an assessment of the Aboriginal heritage values of all areas likely to be impacted before the FMP is finalised.

**Recommendation A comprehensive assessment of the plan area for its importance for Aboriginal heritage must be conducted before any management plan is set in concrete.**

### **1.7 Socio-economic benefits**

1.7.1 Regarding the socio-economic benefits of the native forest logging industry, no reliance can be placed on the URS report on the socio-economic impact assessment on the potential impacts of implementation of the draft Forest Management Plan 2014-2023. It is a biased, inaccurate and deficient report that promotes logging above any other use of native forests. It should not be relied on in the development of the Forest Management Plan 2014 - 2023. For a critique of the report, see Appendix 5.

1.7.2 If the Forest Products Commission had to account for all the costs it incurs from native forest logging, it would show a huge loss. Costs incurred by other government agencies would add materially to this loss. The savings made by ending native forest logging could be used to rehabilitate gravel pits, log landings and unwanted logging roads, get rid of weeds and feral pests in our forests and employ more rangers in national parks.

1.7.3 The native forest logging industry employs very few workers. The most reliable employment figures for the native logging industry estimated the number of people directly employed in native forestry was 613. A further 365 were employed in both native forests and plantations.<sup>8</sup> With government assistance, they could find alternative employment doing work that benefits the forests such as those listed above.

1.7.4 There is enough wood coming from pine plantations to supply WA's timber needs. In 2010-2011, WA produced 207,000 m<sup>3</sup> of coniferous sawnwood but only 71,700 m<sup>3</sup> of broadleaved sawnwood.<sup>9</sup> Approximately 8,250 m<sup>3</sup> of the broadleaved sawnwood was exported<sup>10</sup> and the 71,000 m<sup>3</sup> includes large numbers of railway sleepers.

1.7.5 With 1000 ha of jarrah forest stripped for Alcoa's and Worsley Alumina's bauxite mines every year,<sup>11</sup> there is enough jarrah available to meet the needs of the hand-craftwood industry.

1.7.6 The low cost of logs (karri, jarrah, marri) sold to industry by the FPC acts both as a public subsidy for an unsustainable industry and as a disincentive for sustainable wood production from well-managed farm forestry and plantations.

1.7.7 Native forest logging and associated burning have harmful impacts on other industries. They destroy the blossom beekeepers need for their bees, they make forest unsuitable for recreationists and tourists, and smoke from prescribed burns ruins wine. The costs to these potentially sustainable industries surely outweigh any economic benefit from native forest logging.

1.7.8 The dollar value of the carbon stored in our forests would far exceed any return to the State from native forest logging.

**Recommendation The alleged socio-economic benefits of native forest logging are exceeded by its costs to both government and other industries that rely on native forest so all government subsidies to the FPC, direct and indirect, should be stopped.**

1.7.9 Mining for bauxite, gold, coal and mineral sands (p. 134 and passim) totally destroys forest and the earth on which it grows. Mining should not be allowed in forested areas. It should be restricted to already cleared land.

**Recommendation There must be no further expansion of mining in forested areas and no new mining, in particular strip mining for bauxite, allowed to begin.**

## **1.8 Plan implementation and management**

1.8.1 The EPA has found that the conservation and environmental protection commitments of the current FMP are not implemented or enforced. It has also been proved that widespread breaches of logging prescriptions under the FMP occur, frequently without penalty. The FPC recorded over 500 breaches of regulations, prescriptions and guidelines between 2004 and 2012.

1.8.2 The FMP should not and can not be promoted as a document that ensures ecologically sustainable forest management. There is no intention whatsoever that it be implemented in full. Except for its commitments to logging, it is little more than a smoke screen intended to hoodwink the public into thinking that the Government wants ESFM to be practised in our forests.

1.8.3 The DFMP states categorically that the goal statements are not intended to create any legal obligation. (p. 24). There is no obligation on DEC or anyone to meet the FMP's goals.

1.8.4 The next FMP, like the current one, cannot be enforced by anyone. It is left to the discretion of DEC what activities it will carry out and when. Important actions listed in the current FMP have still not been completed (e.g., creating all the proposed national parks<sup>12</sup>). Power must be given to the Conservation Commission to enforce compliance with the FMP.

**Recommendation If the FMP is to have any credibility as a document that can deliver ESFM, its conservation and environmental protection requirements must be legally binding and the Conservation Commission must be given the power to enforce it.**

1.8.5 Expressions such as 'have regard to' and 'seek to' occur repeatedly and allow DEC to avoid implementing the actions.

**Recommendation Expressions such as "have regard to" and "seek to" must be replaced by "will" or "will comply with" or similar, as are used in some places.**

1.8.6 It is stated repeatedly that implementation of the DFMP depends on availability of resources and funding (p. 27 and passim). As with the current FMP, this allows DEC complete discretion to determine priorities. Using this as an excuse, it implements some of the actions, delays or fails to implement others.<sup>13</sup>

**Recommendation Adequate funding must be provided to enable full implementation of a properly prepared next FMP.**

1.8.7 Some actions do not have appropriate KPIs or any KPIs at all and many are too vague to be useful (see Appendix 6).

**Recommendation There should be appropriate KPIs for all stressors that impact on forests (weeds, pests, diseases, recreation, firewood collection, beekeeping, water extraction).**

**Recommendation Additional and more specific KPIs must be included.**

1.8.8 It is proposed that reporting on performance targets for KPIs be done on a five-yearly basis, and the required response in case of target shortfalls is not included for each KPI.

**Recommendation Reporting on the performance targets should be done on an annual or biennial basis, as in the current FMP, and information on the required response in case of target shortfalls must be included in the FMP, not developed at a later date.**

1.8.9 The DFMP Appendix 4 lists a plethora of documents relating to native forest logging that will interact with the FMP in unknown ways.<sup>14</sup> The hierarchy and interactions of these documents are impossible to determine.

**2. The process for developing the next Forest Management Plan is seriously flawed and lacks any credibility.**

**2.1 The main driver of the next FMP is government policy. The Government wants to log native forests for another 10 years at the maximum level for which markets can be found for logs of any grade or species at any price. It appears to be impervious to reason, economics, science and public opinion.**

2.2 Without providing any evidence, the proponent assumes that the WA community wants logging to continue in our native forests. Despite requests made in submissions on the DFMP scoping document to do so, it has not offered a 'no allowable cut' option even though the logging industry itself was told that a zero allocation was a possibility.<sup>15</sup> If the community knew what is really happening to and in our forests – the environmental harm, the destruction, the waste, the misuse of irreplaceable ancient trees, the cost to the WA economy and taxpayers - people would not allow it to continue nor support any government or agency that permitted and encouraged it to do so.

2.3 It is shocking to read that an identified threat to the forest products industry is “other values taking precedence over productive activities within the land base available for productive [read ‘wood production’] activities” (p. 138).

**Recommendation The protection and maintenance of biodiversity and ecosystem health and vitality must be the top priority of the next FMP, regardless of the impact on the unsustainable, uneconomic native forest logging industry.**



2.4 While theoretically the process is run by the Conservation Commission, in fact it is being run by the Sustainable Forest Management branch of DEC – foresters whose conflicts of interest should make them ineligible to write a forest management plan. They should be commentators on, not participants in the process.

2.5 The Director of the Commission, the person in the Commission with the most knowledge and experience about forest issues and management plans, resigned half way through the submission period (28<sup>th</sup> September 2012).

2.6 Most of those whom DEC's process managers identified as stakeholders want to commercially exploit forests or the land underneath them. Only seven of the 29 stakeholders could be expected to give a conservation perspective as opposed to 19 interested mainly or solely in exploitation.<sup>16</sup>

2.7 Comment is sought at the same time on far too many documents.<sup>17</sup> This would very likely discourage participation.

2.8 Contrary to the final recommendation of the EPA's mid-term audit of performance report,<sup>18</sup> public involvement in the development of the FMP has been virtually non-existent.

2.9 The EPA refused to accept public comments on the Conservation Commission's end-of-term audit of performance report.<sup>19</sup> This is to be contrasted with the process to develop the current FMP, in which the mid-term audit of performance was released for public comment.

2.10 Documents required for a proper assessment of the DFMP have not been made available before the closing date for making submissions. The draft 'silvicultural guideline' for karri and wandoo has not been finalised. The report by the expert panel on sustained yield will not be released until after 7<sup>th</sup> November 2012.

2.11 DEC continues to refuse to show the public the modelling it uses to determine what it calls the 'sustained yield'.

2.12 During 2011, the FPC called for expressions of interest from parties that may wish to buy 800,000 tonnes a year of low grade logs. This action places pressure on government agencies to set an allowable cut that provides this amount of low grade logs and pre-empts the outcome of the next FMP process.

2.13 The FPC has given six sawmillers Investment Security Guarantees with compensation as at 8 March 2012 amounting to \$56 903 258 in the event that the contracted amount of sawlogs is decreased except if the decrease occurs because of climate change or an increase in the spread of Phytophthora dieback as determined by the State.<sup>20</sup> This action places pressure on government agencies to maintain the contracted amounts of sawlogs and pre-empts the outcome of the next FMP process.

**Recommendation To have credibility, the next Forest Management Plan must be prepared with genuine and effective public involvement in the process as recommended by the EPA in its mid-term Audit of Performance report. This includes a transparent process to determine the 'sustained yield'.**

### **3. The draft Forest Management Plan document is flawed in presentation.**

“This paper, by its very length, defends itself from ever being read.” – Winston Churchill

3.1 The DFMP contains paragraphs and whole pages of text that are completely irrelevant to forest management and have no place in the management plan. Much of it is an apology for logging and burning.

**Recommendation Most of what is called ‘background’ should be omitted from the FMP along with other irrelevant material, including all that is merely an apology for logging and burning.**

3.2 The glossary contains wrong definitions (‘timber harvesting’), includes easily understood words (‘heritage’) and omits difficult words (‘seral,’ p. 39, ‘xeric’, p. 31).<sup>21</sup>

**Recommendation The glossary should be rewritten by people who understand the correct use of the English language.**

#### **Conclusion**

The WA public has once again been presented with a DFMP that does not provide crucial information, ignores key scientific studies and the findings of official reviews of the previous FMP implementation, and fails completely to establish the sustainability of what is proposed.

It is clear this is a political document designed to implement government policy and is not in any way a document that sets out a sustainable future for our forests and their use.

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<sup>1</sup> See answer to Western Australia, Legislative Council, Question Without Notice No. 479 of 2012.

LEGISLATIVE COUNCIL

479

QUESTION WITHOUT NOTICE  
(Of which some notice has been given)

Tuesday, 14 August 2012

Hon Giz Watson to the Minister for Mental Health representing the Minister for Environment.

I refer to the answer given to question on notice no. 4456 of 2011, which lists five fauna species, *Calyptorhynchus banksii naso* (red-tailed black cockatoo), *Atrichornis clamosus* (noisy scrub-bird), *Phascogale tapoatafa* (brush-tailed phascogale), *Bettongia penicillata* (woylie) and *Botaurus poiciloptilus* (Australasian bittern) as having moved to a higher category of threat since the Forest Management Plan 2004-2013('FMP') came into operation, and I ask -

- (1) Does the Minister acknowledge that (as stated in the end-of-term audit of performance report of the FMP at page 75) *Calyptorhynchus baudini* (Baudin's black cockatoo) moved from Vulnerable to Endangered in 2005?
- (2) If yes to (1), why was this species omitted from the list?

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**I thank the Hon. Member for some notice of this question.**

(1)-(2) The response to question 4456 was incomplete as a result of an oversight by the Department of Environment and Conservation. The nomination of Baudin's black cockatoo as Endangered was made prior to 2004 and was accepted by the Threatened Species Scientific Committee in February 2004. The *Forest Management Plan 2004-2013* came into effect on 1 January 2004.



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<sup>2</sup> See, for example, “The results from FORESTCHECK show that the biodiversity of the jarrah forest is resilient to disturbance from silvicultural operations, and indicate that provided a forest management regime is maintained that embeds silvicultural operations in a mosaic of connected areas where no harvesting occurs, and specific measures are applied for particular species, biodiversity will be maintained. “ (p. 43)

<sup>3</sup> Whitford, K.R. and Mellican, Amanda E. (2011). Intensity, extent and persistence of soil disturbance caused by timber harvesting in jarrah (*Eucalyptus marginata*) forest on ForestCheck sites. *Australian Forestry*. Volume 74, No. 4, December 2011

<sup>4</sup> Legislative Council Question on Notice No. 6378 of 2012

Regarding the herbicide application to the forest in Yabberup 2009, I ask: (

- (a) which herbicides were applied in this area;
- (b) if Roundup was used, what type;
- (c) what was the total quantity of herbicide applied

(a) Glyphosate 450 was used. Glyphosate 450 is a water soluble herbicide that is absorbed by plant foliage and green stems. It is translocated within the plant from the point of contact to the root system.

A solution of 85 per cent chemical and 15 per cent water was applied. Three millilitres of the solution was applied to each notch. The average rate of application was 3 to 4 litres of solution per hectare. However, the intensity of application varies depending on the silvicultural objective. The total area treated at Yabberup was 1350 hectares. Based on the average rate of application, it is estimated that approximately 4000 litres of chemical was used.

<sup>5</sup> “Many scientists believe the greenhouse effect from increased levels of atmospheric carbon dioxide, methane and other greenhouse gases is increasing the Earth’s temperatures to the point of undesirably changing the Earth’s climate” (p. 83); “If rainfall declines...” (p. 85).

<sup>6</sup> Various dates for rainfall data are given in the DFMP (e.g., to 1978, p. 76, the period 1960 to 1990, p. 83).

<sup>7</sup> Lindenmayer, David B., Burton, Philip J. and Franklin, Jerry F. (2008). *Salvage logging and its ecological consequences*. CSIRO Publishing, Collingwood, Victoria.

<sup>8</sup> URS (2012). Social and economic impact assessment on the potential impacts of implementation of the draft Forest Management Plan 2014 – 2023, p. 80.

<sup>9</sup> ABARES (May 2012). *Australian forest and wood products statistics September and December quarters 2011*.

<sup>10</sup> Commonwealth of Australia, Senate Question on Notice No. 1322 of 2011

<sup>11</sup> Western Australia, Legislative Council Question on Notice No. 5928 of 2012

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<sup>12</sup> The failure to legislate to create all the national parks and nature reserves approved under the current FMP is due in part to opposition from the Department of Mines. It is unconscionable that a government department should be able to frustrate implementation of the FMP, which is the result of a whole-of-government decision.

<sup>13</sup> DEC's choice of the actions to be implemented in the current FMP is revealing. Actions related to logging (silviculture guidelines) were produced on time. Actions for the protection of biodiversity were delayed for years or never prepared at all (goals for understorey protection).

<sup>14</sup> See Appendix 4 of the DFMP.

<sup>15</sup> AECGroup (2011). *Options for the future development on the timber industry in the Shire of Manjimup (Stage Two)*. South West Development Commission p. iii.

**RELEASED UNDER FOI**

DOCUMENT NO: /

FREEDOM OF INFORMATION REQUEST 2012/2654  
 Western Australian Forest Alliance  
 16 May 2012

*Forest Management Plan 2014 - 2023 – Department of Environment and Conservation  
 Non-Statutory Consultation*

List of stakeholders and dates consulted

Organisation	Date(s) consulted
Alcoa	20 January 2012
Bauxite Resources Limited	No meeting, written submission received
Centre of Excellence in Forest Health, Woodlands and Climate Change	17 January 2012
Chamber of Minerals and Energy and Australian Petroleum Production and Exploration Association	20 December 2011 Joint meeting
Conservation Council of WA	8 December 2011 16 January 2012
CSIRO	14 December 2011
Curtin University	23 January 2012
Department of Indigenous Affairs	11 November 2011
Department of Mines and Petroleum	19 October 2011 19 December 2011
Department of Sport and Recreation	3 November 2011
Department of State Development	19 October 2011 19 December 2011
Department of the Premier and Cabinet	23 November 2011
Department of Water	26 October 2011
Edith Cowan University	19 March 2012
Forest Industries Federation of Western Australia	28 November 2011
Forest Products Commission	2 November 2011
Institute of Foresters (WA)	7 December 2011
Office of the Environmental Protection Authority	8 November 2011 21 December 2011
Peel Development Commission	27 October 2011
Regulatory Gatekeeping Unit, Department of the Treasury	12 January 2012
South West Aboriginal Land and Sea Council	30 November 2011
South West Development Commission	9 November 2011
Shire of Bridgetown-Greenbushes	9 November 2011
Shire of Manjimup	9 November 2011
State Gravel Supply Strategy meeting	24 November 2011
The Wilderness Society	8 December 2011
Tourism WA	16 November 2011
Water Corporation	10 November 2011
Western Australian Forest Alliance	8 December 2011
Western Australian Local Government Association	7 November 2011

<sup>17</sup> The DFMP is 285 pages long. The draft 'silvicultural guideline' for jarrah is 46 pages long. The 'independent review of silvicultural practices' is 47 pages long. The URS report, *Social and economic impact assessment on the potential impacts of implementation of the draft Forest management Plan 2014 – 2023*, is 144 pages long.

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In addition there are numerous policies, guidelines, references and other documents relevant to the next FMP that should be taken into account in submissions on the DFMP.

<sup>18</sup> “Matters that the EPA considers need to be addressed during preparation of the next FMP include:

- Genuine and effective public involvement in the process.”

<sup>19</sup> **From: Vogel, Paul <Paul.Vogel@epa.wa.gov.au>**

**Subject: Re: End-of-term audit of performance report**

**Date: 5 June 2012 12:05:05 AM AWST**

**To: beth schultz <beth.schultz@amnet.net.au>**

Beth, I am overseas at the moment. The EPA will not formally consider any public comment on the EOT audit as it did not seek any. To consider only your comments and no other comment would open the EPA to criticism of an abuse of process, which given the controversial issues involved would not be helpful.

Regards

Dr Paul Vogel  
CHAIRMAN, EPA

<sup>20</sup>

**2004**

**MINISTER FOR STATE DEVELOPMENT**

**AND**

**[Name]**

**AND**

**GENERAL MANAGER OF THE FOREST PRODUCTS COMMISSION**

**INVESTMENT SECURITY GUARANTEE**

**DRAFT 30.6.04**

### **3. EXCEPTIONS TO COMPENSATION**

#### **3.1 No Compensation under ISG**

The Minister will not be liable to pay compensation to the Recipient in any of the following circumstances

(e) the change in State government policy which causes the reduction in Log Timber Intake was influenced by:

- (i) climate change; or
- (ii) ‘an increase in the estimated spread of dieback

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### **3.2 Climate Change Etc.**

The decision as to whether and to what extent there has been climate change or an increase in the estimated spread of dieback will be made by the State. Where climate change or an increase in the estimated spread of dieback has influenced State government policy resulting in a reduction in the Log timber Intake or the quantity of Log Timber to be delivered under the Rollover Contract, the State will provide the Recipient with a copy of any relevant reports that have been considered by the State in its decision.

<sup>21</sup> The expression 'regrowth forest' should only be used for stands where all the trees have regrown after clearfelling or similar catastrophic disturbance. When used for logged forest, the expressions 'mixed age forest' and 'uneven-aged forest' are incorrect because, except for post-clearfelling even-aged regrowth, all forest, logged and unlogged, is mixed age or uneven-aged. When there is a mixture of regrowth trees and mature trees, the correct expression is 'cut-over forest'. This is also preferable to the curious and misleading expression 'two-tiered forest'.