



Dr Neil Burrows  
Chair  
Silvicultural Review Panel

11<sup>th</sup> March 2022

Dear Dr Burrows,

I am writing on behalf of WA Forest Alliance to provide input to the silvicultural review being conducted for the next 10-year Forest Management Plan.

We understand that a central focus of your panel is the design of a thinning program for the forests and so we have concentrated on thinning in this submission. We make our remarks in the broader context of the State Government's commitment to end native forest logging by the beginning of the next FMP, and the high level of investment that WAFA and the broader West Australian community have in seeing this policy fully implemented.

### **Thinning – overview**

WAFA's position is that thinning must be regarded as a restoration tool and only used cautiously to aid ecosystem restoration following major disturbances such as clear-felling and clearing for mining.

Any thinning programs must be limited to areas where past major disturbance has resulted in an unnaturally dense immature structure that the forest is unable to recover from without intervention.

There are inherent questions that arise when considering what such a program would entail including the measurement of density, risks associated with intervention and with a non-interventionist approach, objectives, operational practices, monitoring and adaptive management and others. We have set out our input on these matters in broad terms below and we'd be happy to discuss any of them in more detail with you and your fellow panellists.

### **Objectives**

Water production and improving future timber yields have been key objectives of thinning in the South West forests to date. The new policy settings require a different set of objectives and a whole-of-forest, restoration ecology approach which can be shown to demonstrably improve forest health and have no adverse impacts on forest health or biodiversity.

To achieve this, WAFA believes that clear and measurable goals should be formulated at the stand, regional, and landscape scales and the following specific objectives must be set and described for any thinning program:

1. Improved soil health and function compared to unthinned control sites, including no measurable increase in soil compaction.

2. Increased rate of radial growth of the trees compared to unthinned control sites to enable more carbon to be stored, hollow formation to occur, and the overall structure of the forest to develop towards historic mature forest structure.
3. Improved under-storey response, including response of fungi, compared to unthinned control sites.
4. Fauna habitat protection and improved recovery of fauna compared to unthinned control sites.
5. Improved recovery of soil carbon levels compared to unthinned control sites.
6. Improved climate resilience compared to unthinned control sites, where the aim is restoration of forests that have been subject to major disturbance and are now unnaturally dense and drought prone as a result.

### **Adaptive Management**

The program should be adaptive, driven by evidence, and based on experimental principles with control sites where no intervention occurs, and others where only one element of the program is changed. Comprehensive monitoring programs must be incorporated into the program and adjustments to forest management and operations made in accordance with findings that are available to the public and independent experts.

### **Site selection for thinning operations**

In the first instance, sites would be selected on the basis of being unnaturally dense, immature stands resulting from past disturbance. Stands with the highest level of density and providing the largest likely benefits to those forest areas (groundwater, biodiversity, forest structure) should be prioritised. Thinning operations should be restricted to the spatial extent of past disturbances; operational boundaries should not be used to remove any trees from forests that are not over-dense.

The area of forest that has been subject to logging disturbance is far too large, and too varied in its structure, health, function, and resilience to be considered as one category. Large parts of the Jarrah forest that have been logged, including under a Bradshaw prescription, have not responded by becoming unnaturally dense and do not require and would not benefit from any thinning program.

WAFAs view is that areas of mine-site rehabilitation should be prioritised and that funds for the program should be recovered from the relevant mining companies wherever possible.

No thinning of forests in reserves, or forests that are mature, intact, or have not been subject to intensive disturbance such as clear-felling, clearing or gap-creation should be contemplated. The spatial scale of operations must be precisely confined to those forest areas that have been subject to intense past disturbance resulting in unnatural densities that the forest is unable to recover from without intervention.

### **Operational practices**

Only small diameter trees in over-dense pockets should be marked for removal. Thinning should utilise the smallest, lightest equipment possible to minimise soil compaction and reduce broader impacts. Post-thinning burning of logging slash should be avoided as it can lead to high intensity fire and damage soil. Burning has been used post-logging to create a seedbed for regeneration but that is not the objective here. Large trees should be retained in all circumstances and impacts on under-storey should be minimised. Dieback management must be best-practice.

Marri trees should be retained and not targeted for removal. The loss of millions of marri trees for woodchips or simply removal as an impediment to Jarrah, preferred as a sawlog resource, has had serious impacts on fauna habitat and forest structure and function. The impact of thinning on the prevalence of marri canker (*Quambalaria coyrekup*), its extent and severity, need close attention.

### **Finishing the program**

Clear completion criteria should be established based on measures of forests being self-sustaining and meeting the goals and objectives set for the program.

Thank you for the opportunity to submit our comments on the proposed thinning program. We look forward to further input and we are available for discussion or clarification on any of the points we have raised.

Yours sincerely,

A handwritten signature in blue ink that reads "Beckerling". The signature is written in a cursive, flowing style.

Jess Beckerling  
Convener  
WA Forest Alliance