



Submission on the Draft Forest Management Plan 2024-2033

By email: forestmanagementplan@dbca.wa.gov.au

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Thank you for the opportunity to comment on the draft Forest Management Plan 2024–2033. WA Forest Alliance is the peak non-government forest conservation organisation in WA. We represent 26 groups and many thousands of individuals in our advocacy for forest conservation outcomes.

Please find a list of groups and individuals who would like to have this submission counted in their names, appended at the end of this submission. [List will be appended for submission on Sunday 18th December]

General comments on the plan

WA Forest Alliance and the groups and individuals making this submission in their own names wholeheartedly support the significant change in direction represented in the plan. Specifically, we strongly support the end of native forest logging and the proposed increases to the formal conservation system; the centralising of Noongar / Bibbulmun custodianship and commitments to co-management arrangements; the recognition of the role that protected forests play in carbon storage and the acknowledgement of the need to manage use, activities, weeds, feral animals and diseases that impact forest health.

However, there are a number of elements that must be reconsidered in order to protect and maintain recognised values and to achieve objectives of biodiversity conservation and partnership with Noongar people. In addition, further detail and precision is required in some cases, and in others a change in management direction or an additional community consultation process is needed.

1. Noongar partnerships

We strongly support the focus that the FMP places on Noongar / Bibbulmun peoples' custodianship, knowledge, culture and on-going connection to the forests, and the commitment to the development of Cooperative Management Agreements. However, the draft FMP has failed to set out a process for co-vesting, which is provided for under current legislation and should be addressed before the FMP is finalised.

Page	Section	Recommendation
53-55	Part C Foundation 1	Include provision for, and tangible planning towards, co-vesting as well as co-management
55	Table 3	Change the <u>title</u> of the table to: <i>Summary of management directions for Noongar cultural heritage and co-vesting and co-management partnerships</i>
55	Table 3	Add the following <u>management objective</u> and associated activity: [Objective] <i>Establish co-vesting arrangements with Noongar Traditional Owners</i> [Activity] <i>Partner with Noongar Traditional Owners to decide on places and parameters for co-vesting in the South West Conservation Estate.</i>
55	Table 3	Strengthen the final <u>management activity</u> so that it reads: <i>Increase employment and training of Noongar Traditional Owners to participate in all levels of management in the planning area.</i>
56	Table 4	Change the <u>strategic goal</u> to read: <i>To value and protect Noongar cultural heritage, implement Noongar Traditional Owner co-management and co-vesting and include Noongar Traditional Owners in management decisions.</i>
56	Table 4	Add the following <u>performance measure</u> and associated <u>management target</u> : [Measure] <i>Co-vesting and co-management arrangements are implemented</i> [Target] <i>Co-vesting and CMAs are in place by the mid-term review of the FMP</i>

2. New Protected Areas

The commitment to securing the formal protection of a minimum of 400,000 ha of new protected areas and formalising the secure protection of the 320,000 hectares already proposed for conservation is strongly supported.

However, the conspicuous neglect of the Northern Jarrah Forests is unacceptable. The lack of detail regarding the indicative protected areas in terms of process, timeframes, boundaries, land categories, interim protection mechanisms and prescriptions for possible thinning in some areas prior to land category changes is problematic and significantly reduces the capacity for this draft FMP consultation phase to constitute meaningful community engagement.

We recommend alternative words and phrases to avoid using the word 'reserve', which we understand is insensitive to many Noongar people. In some places we have replaced 'reserves' with 'protected areas' with the intended meaning being protection in the formal conservation system network.

Page	Section	Recommendations
56	Part C Foundation 2	Explicitly include the prioritisation of the additional minimum 400,000 ha, not only the 320,360 of existing commitments, so that the second para in 5.4.1 reads: 'Maintaining and expanding the CAR formal conservation system through implementing the 320,360ha of commitments identified in previous FMPs and gazetting at least a further 400,000ha of protected forest ecosystems is a priority for this plan.'
24 & 57	Old growth forest	Correct the applied definition of old-growth forest to focus on the ecological function of the forest, not its history of disturbance, so that rather than counting stumps, the assessment considers the structure and function of the forest and looks for 'ecological maturity' in accordance with the NFPS definition. Make the minimum area 0.5ha, not 2ha, and give the Conservation and Parks Commission responsibility for criteria development and assessments.
56	5.4.1	Acknowledge the very low representation of the Northern Jarrah Forest region in formal conservation, and the very particular vulnerability of the region to existing and projected implications of climate change. Commit to creating new National Parks and other formally protected areas in this region.

56	5.4.1	In describing a process for investigating areas for inclusion in the conservation system, the emphasis should be on high conservation values and ecological principles of good conservation system design, not 'anticipated future activities and uses'.
57	5.4.1	When referring to thinning prior to including areas of regrowth in new protected areas, refer to detail on prescriptions and objectives– and where not available, to transparent and accessible processes by which these will be developed.
57	5.4.1	Clarify what is meant by 'agreement of the relevant party will be required'. Does DBCA or others have legal advice to this effect, or is it policy? The public should be clearly informed about this.
57	5.4.1	Specify that mining and clearing for other purposes will be immediately excluded from all indicative areas for future protection through an interim protection category and / or other mechanisms available to DBCA, CPC and the relevant Ministers.
59	Table 5	Add / edit the <u>key points and considerations</u> to include the following: • <i>All existing proposals for conservation areas are to be carried forward in this plan</i> • <i>Minimum of 400,000 ha of new protected areas to be gazetted during the period of this plan</i> • <i>Additional protection will be ensured in currently underrepresented Northern Jarrah Forest region</i> • <i>Old-growth forests remain a key value and the definition will be updated to protect all ecologically mature forest with old-growth structure and function.</i> • <i>High Conservation Values, connectivity and other ecological principles of conservation system design are priority considerations for new and expanded protection.</i> • <i>Mapping published by The Beeliar Group will form the basis for stakeholder engagement on the expanded conservation system.</i>
59	Table 5	Add / edit the <u>management activities</u> to include the following: • Progressively assess indicative areas for increased protection based on the values, principles and design reflected in mapping published by The Beeliar Group and community consultation processes. • Work with relevant Ministers and agencies to immediately exclude mining from all potential future protected areas.
63	Table 8	Add / edit the <u>management targets</u> to read: <i>Both the 320,360 of existing proposed protected areas, as well as at least a further 400,000 ha of new protected forest ecosystem are gazetted by the mid-term audit of the FMP.</i>

3. Thinning

Wafa recognises that if thinning is conducted as an ecological restoration exercise, it has the potential to benefit unnaturally dense mine-site rehabilitation and certain immature regrowth forests, especially where hydrological and climatic factors mean that those areas are suffering water stress and drought impacts. However, implemented too broadly or without appropriate safeguards, the program will deliver perverse outcomes and cause damage to forests, soils and habitat; increase fire risk; reduce biodiversity and resilience; emit carbon into the atmosphere and prolong the decades-old conflict over forest management.

Page	Section	Recommendation
65 & 71	Part C Foundation 3 5.5.2	<u>Broad recommendations on principles, scope and design</u> 1. Explicitly limit thinning to mine-site rehabilitation and immature regrowth and to the purpose of ecological restoration 2. Through the Conservation and Parks Commission, establish an independent expert body of scientists to oversee and implement the program 3. Provide for this independent body to establish a transparent, consultative process for developing detailed prescriptions including with meaningful engagement from Traditional Owners and community conservationists 4. Commit to long-term trials in a variety of sites prior to considering any commercial contracts and/or broadening their scope 5. Identify and quantify potential impacts including soil compaction, dieback spread, carbon emissions and possible medium-long term reduction in stored carbon, possible increased flammability.
65	5.5.2 Objectives	Define detailed measurable objectives of the program. Some objectives, which should be discussed and finalised by the independent body of scientists, in consultation with Traditional Owners and community conservationists, should include: 1. Improved climate resilience compared to unthinned control sites, where the aim is restoration of forests that have been subject to major logging and clearing disturbance and are now unnaturally dense and drought prone as a result. 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 soil health and function compared to unthinned control sites, including no measurable increase in soil compaction.
65	5.5.2	Change 'Forest Enhancement Areas' to 'Forest Restoration Areas' to reflect the purpose of the program and specify that these are unnaturally dense mine-site rehabilitation and immature regrowth areas only.
66 - 70	Candidate Areas	• Change 'vulnerable forest structure or condition' to 'mine-site rehabilitation and immature regrowth areas that are unnaturally dense and vulnerable to drought stress'. • Outline the need to assess rehabilitation and immature regrowth areas for their potential to benefit from thinning and the need for control sites to be able to monitor the program and adapt depending on whether the program is achieving objectives. • Delete the sentence 'while thinning older regrowth stands will provide immediate benefits' on p69. There is no evidence (and none has been provided in this draft FMP) that there is any ecological restoration case for thinning older stands of regrowth. • We strongly support the proposal (p69) to develop adaptive trials to monitor effects on hydrological benefits. Effects must be established prior to consideration of widespread application. • For karri regrowth, remove any consideration of sites not clear-felled since 1975. • For previously logged jarrah, remove any consideration of sites not logged to gap or shelterwood since 1986, and specify a density measure and hydrological condition that makes the site a potential candidate. • Remove reference to thinning beyond regrowth patches. Any such thinning is unwarranted and unacceptable. There must be no trials of thinning outside of unnaturally dense immature regrowth and mine-site rehabilitation.
70	Scale	Results of trials must be available for consideration by independent restoration ecology experts before any thought can be given to a widespread program. 8000ha is 1500ha <u>more</u> than is currently logged per year. It represents a significant area and is not in keeping with a 'trial and adaptive management' approach.
70	Essential components	Include:

		• Small diameter trees only (DBHOB to be decided by restoration ecologists in transparent and community engaged process). • Small light machinery and hand-falling only. • Thinning from below only, and maintenance of canopy connectivity for shade and habitat and to prevent lignotuber stimulation in jarrah. • Protection of marri trees, especially where past logging practices have reduced numbers of marri trees on site and in surrounding landscape. • Avoid use of herbicides.
70	Co-benefits	No contracts for wood produced from thinning should be contemplated. Prioritising restoration and adaptive management systems requires being able to make adjustments to the program. This will not be feasible if commercial contracts are in place. Restoration of ecological function must be the primary and sole purpose, with the details set out in measurable objectives. This must not be confused or diluted by adding subsidiary ‘benefits’ such as ‘improved visual amenity’ and ‘distribution of fuel loads.’ Including these unscientific objectives opens up the program to manipulation.
71	Table 14	<u>Key points and considerations</u> are too vague and should be amended to provide clarity and certainty regarding the objectives and applications of the proposed program. To avoid repetition – please see sections above for our recommendations on points that should be included and excluded from key points and considerations.
71	Table 14 Management Objectives and Activities	Add / edit the <u>management objectives and activities</u> to include the following: • Remove <i>‘and other vulnerable landscapes’</i> from objectives • Add <i>‘Through the Conservation and Parks Commission, establish an independent expert body of scientists to develop ecological thinning trial prescriptions in consultation with Traditional Owners and community conservationists.’</i> • Delete Forest Products Commission from this section. FPC should not be involved in the operations and contract management and no products should be sold under any contracts. • Move <i>‘Undertake research into use of ecological thinning as an adaptation strategy to minimise impacts of climate change’</i> to the top of the activities; clarify that it is in immature regrowth and mine-site rehabilitation areas only and make further thinning in similar sites dependent on positive results of the trials.

4. Fire

A comprehensive review of fire management is needed. The current objectives, targets, planning, and implementation practices are not fit for purpose and the social and environmental implications are profound. The fire section of the draft FMP needs a major overhaul before the final plan is published.

Biodiversity conservation must be DBCA's priority in all activities, including fire management. There is no other agency operating on the ground in the FMP area that is tasked with biodiversity conservation. If biodiversity conservation cannot be prioritised by DBCA then fire management should be handled by another body.

Current prescribed burning approaches are having profound and unacceptable impact on forests, wildlife and biodiversity and there are serious concerns that the practice is inadvertently increasing fire risk through escapes, particularly as climate change makes burning more difficult, as well as through the rapid and dense regrowth of under-storey and mid-storey plants after too-frequent fires.

Page	Section	Recommendations
72-74	Part C Foundation 3 5.5.4	<u>Broad recommendations on objectives, targets and operations</u> 1. Consideration of fire management in the draft FMP requires a thorough overhaul. 2. It is critical that DBCA prioritises biodiversity conservation in its fire management. 3. The FMP should acknowledge the impacts of current prescribed burning regimes on wildlife, forest health and resilience, soils, forest structure and function, air quality and human health and emissions of carbon dioxide. 4. Fire sensitive ecosystems including peats, Tingle forests, red-flowering gum ecosystems and granites should be actively protected from fire. 5. The annual arbitrary prescribed burn target should be abandoned. 6. The practice of burning of large remote areas should be abandoned. 7. There should be far greater resourcing of, and emphasis on, rapid suppression. 8. There should be no burning in dangerous fire weather to prevent hot fires and escapes and to keep resources available for emergencies. 9. Through the Conservation and Parks Commission, conduct periodic assessments of the implementation of DBCA's prescribed burns.

		10. Develop and maintain a comprehensive and representative network of fire exclusion areas including remaining long-unburnt areas, peat wetlands, granite outcrops, tingle forest, red-flowering gums and other fire sensitive ecosystems. 11. End the use of aerial ignition and focus prescribed burning programs within close proximity to towns, dwellings and infrastructure. 12. Through the Conservation and Parks Commission, develop criteria for assessing the effectiveness and impacts of prescribed burns and make post-burn reports, based on these measures, publicly available.
43	Part B Potential consequences of climate change	Add the following to the <u>Fire frequency and behaviour</u> section: • <i>Increasing rapid suppression capabilities and avoiding lighting any fires in or immediately before the onset of extreme fire weather, focusing fire mitigation efforts in close proximity to settlements and other assets will mitigate bushfire risk to communities.</i> • <i>Fire-sensitive ecosystems including peats, Tingle forests, red-flowering gums and granites are increasingly vulnerable to the impacts of climate change and must be actively protected from fire.</i>
64	Part C Foundation 3 5.5.1	The following statement is not based in science, it undermines any community confidence in DBCA's commitment to scientific rigour and should be deleted: <i>'Carbon stock losses from biomass burning do not increase the accumulated atmospheric CO₂ concentrations under historical fire regimes. However, carbon stock dynamics may alter if fire regimes are impacted by climate change through an increase in the size and scale of large, intense summer bushfires.</i> It seems that the statement is based on the premiss that prescribed burns are mild and wildfires are intense. However, the evidence is prescribed burns are often just as intense as wildfires, are far more frequent and cover a far greater area in most years. Unless DBCA can provide data to support its claim, the statement should be removed.
72	Part C Foundation 3 5.5.4	Acknowledge the failure of current prescribed burns to be genuinely sympathetic to the <i>'ecological requirements of forest ecosystems'</i> considering the following:

		Many species of flora and fauna need long unburnt habitat, but little is left long unburnt, and with large areas covering a variety of ecosystems being aerially burnt at once, the capacity for sophisticated, sensitive burning is limited at best. With at least 45% of the land managed by DBCA arbitrarily 'required' to have a 'fuel age' of less than 6 years, species that require long unburnt forest ecosystems including those that seed at frequency of over six years, are being deprived of essential habitat and are at increasing risk of extinction. Populations of threatened fauna such as Numbats, Quokkas, Honey Possums and Ring-tailed Possums have been devastated by planned burns and the three species of Black Cockatoos are put at increased risk with planned fires changing the floristic structure, function and diversity of the forest. This includes by destroying older trees with hollows, wiping out important food trees such as banksias and directly killing adults and chicks on nests through heat and smoke. For the maintenance of biodiversity and the protection of fire-sensitive species and ecosystems including a number of threatened flora and fauna species, tingle forests, granite and peat systems and red-flowering gums, it is critical that WA implements a far more sophisticated fire management program that prioritises biodiversity conservation.
72	Part C Foundation 3 5.5.4	Rather than only considering potential benefits of fire on species and ecosystems, account for the potential dis-benefits and articulate a plan for avoiding them.
74	Table 16	Delete the first four points from <u>key points and considerations</u> and add the following: • <i>Care for country, including maintenance of biodiversity, and the protection of life are the primary considerations when planning and implementing fire management activities.</i> • <i>Fire is an important component of forest health and for ecosystem functioning in certain ecosystems but can have detrimental impacts on others, especially when applied too frequently or during certain seasons or weather patterns.</i> • <i>Too-frequent fire can cause unnaturally dense understorey vegetation which can exacerbate fire risk and intensity.</i> • <i>Long-unburnt ecosystems are critical for some flora and fauna species.</i>

74	Table 16	Add to <u>Management activities</u> to include the following: • Through the Conservation and Parks Commission, develop criteria for assessing the effectiveness and impacts of prescribed burns and make post-burn reports, based on these criteria, publicly available. • Develop and maintain a comprehensive and representative network of fire exclusion areas including remaining long-unburnt areas, peat wetlands, granite outcrops, tingle forest, red-flowering gums and other fire sensitive ecosystems. • Quantify the impacts of all prescribed burns on wildlife, forest health and resilience, soils, forest structure and function, air quality, human health and emissions of carbon dioxide and make data publicly available. • Make burn prescriptions publicly available. • Through Cooperative Management Agreements, collaborate with Noongar custodians in all levels of fire management. • Provide input to an independent review of fire management
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5. Social and economic benefits and opportunities

The South West forests are under increasing pressure from various activities including mining, BRM, tourism, recreation and firewood collecting (both legal and illegal). It is critically important that these pressures are actively managed by well-resourced programs that prioritise conservation and forest health.

Page	Section	Recommendation
85	Part C Foundation 4 5.6	Edit <u>Strategic Goal</u> to read: <i>To deliver social and economic benefits through the provision of goods and services without compromising biodiversity and conservation values</i>
86	Table 24	Edit <u>management objectives and activities</u> to read: <i>[Objective] Provide for a range of recreation and nature-based tourism opportunities through visitor planning that ensures negative impacts on biodiversity, conservation and heritage values are avoided, while delivering economic benefits to meet public demand.'</i>

		[Activity] <i>Assess existing and proposed recreation and tourism opportunities to ensure that approved activities enhance, or do not negatively impact on, the area's key values, visitor experiences and sense of place.</i>
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6. Climate and carbon

WAFA and signatories strongly support the draft FMP's recognition of the value of protected forests in mitigating and building local resilience to climate change. However, the separation of carbon and climate from biodiversity is problematic, and the focus on burning and thinning, as opposed to ecosystem restoration and biodiversity conservation is counterproductive to the stated strategic goal of this section in the plan.

The draft FMP also underestimates the carbon emissions that result from burning and clearing for mining and other purposes, saying that 'carbon stock losses from biomass burning do not increase the accumulated atmospheric CO₂ concentrations under historical fire regimes' (p64) and 'the overall forest carbon storage in the planning area is anticipated to remain relatively stable as most of the forests won't be subject to significant disturbance over the next decade unless large-scale bushfires or other natural events occur.' (p64)

It is unclear how the draft FMP can make the case that burning a minimum of 200,000ha of forest per year intentionally doesn't increase carbon in the atmosphere but that large-scale bushfires do. Further, the clearing of 1000ha of carbon-dense forests for mining each year is significant and should not be underestimated by comparing its size to the whole of the forest estate.

Biodiverse forests are more resilient to climate change than forests with lower species diversity, and the protection and maintenance of species and overall biodiversity is no less important than storing carbon.

Page	Section	Recommendations
64	Part C Foundation 3 5.5 Table 9	Delete the sentence 'Overall forest carbon storage is anticipated to remain relatively stable over the next 10 years' from <u>key points and considerations</u> . And add the following: <i>Biodiversity conservation is of equal importance to carbon storage.</i>

		<i>Biodiverse forests are more resilient to the impacts of climate change, and when managing forests in the context of carbon storage and climate change, maintenance of biodiversity must be a priority.</i>
64	Table 9	Delete the first two <u>management activities</u> and add the following: • <i>Measure and provide data on carbon emissions, forest carbon stock losses and reduction in sequestration potential that result from clearing and prescribed burning, including escapes, each year.</i> • <i>Create a network of National Parks and other Class A protected areas across the under-represented and vulnerable Northern Jarrah Forests.</i> • <i>Make restoration of cleared land a priority, particularly where it can link habitat for species movement and resilience.</i> • <i>Provide for a high level of community and independent expert engagement in the development of climate mitigation and resilience programs.</i>

7. Disturbances

The draft FMP acknowledges the real and potential impacts of authorised and unauthorised activities including firewood collecting, dumping, clearing for roads and bridges, BRM access and others, but falls short of making strong plans to avoid and minimise such impacts.

Page	Section	Recommendations
84	Part C Foundation 3 5.5.10	Strengthen the language in the <u>management objectives and activities</u> to remove 'seek to' and 'endeavour to' and add: <i>Significantly increase resourcing of local DBCA offices to investigate and take action to prevent illegal firewood collection and other unauthorised activities which negatively impact forests and wildlife.</i>

92	5.6.4 Access	No new roads or bridges should be allowed where they require habitat clearing or would otherwise cause substantial impacts on wildlife or environmental or heritage values.
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8. Implementation

The degree to which the implementation of the next 10-year FMP is sensitive, transparent, community-connected, scientifically robust and adaptive implementation will underpin its success or failure.

We recommend the following additions to Part D

Page	Section	Recommendations
96	Part D	Add two <u>strategic goals</u> 1. <i>Develop and implement transparent monitoring and adaptation systems based on principles of best-practice conservation of biodiversity, heritage and ecological restoration.</i> 2. <i>Seek out and incorporate external knowledge and data to enhance conservation and forest health outcomes and build lasting connections with independent experts, community conservationists, beekeepers, tourism and recreation operators and others.</i>
96	6.2.1	Add the following sentence to the end of section 6.2.1 <i>As well as forming formal partnerships with Noongar Regional Corporations, standing arrangements will be established with independent scientific experts, community conservationists, beekeepers and tourism and recreation operators to share knowledge and data, including results of monitoring programs and research, and to discuss and seek to agree on prescriptions for active management and adaptive management directions.</i>

Photograph caption and mapping errors

There appear to be some errors in the captions of some photographs and maps in the draft plan.

1. pii 'Old growth Boranup Karri Forest – should rather read: *Boranup Karri Forest*.
2. p12 'Tingle forest, Wilsons Inlet Denmark – should read *Tingle Forest, Nornalup Inlet, Walpole*.
3. p96 'Pemberton Pools, Pemberton – should read *Warren River, Warren National Park*.
4. Rainfall isohyet map showing 1400mm zone should be updated to reflect current rainfall zones.

Conclusion

Thanks again for the opportunity to make our submissions on the draft Forest Management Plan for 2024-2033. We trust that our comments and recommendations will be taken on board in the development of the final plan and look forward to a final FMP that sets the groundwork for a decade of forest, wildlife and biodiversity conservation.