

## Response ID ANON-4EM2-EKMQ-6

Submitted to **Native vegetation issues paper**

Submitted on **2020-02-10 13:15:44**

### Your details

#### 1 What is your name?

**Name:**

John D Clarke

#### 2 Can we publish your response?

Yes, you may publish my response in full

#### 3 What is your email address? (optional)

**Email:**

[REDACTED]

#### 4 What is your postcode? (optional)

**Postcode:**

[REDACTED]

#### 5 Do your views officially represent those of an organisation?

Yes, I am authorised to submit feedback on behalf of an organisation

**If yes, please specify the name of your organisation.:**

Institute of Foresters of Australia incorporating Australian Forest Growers.

#### 6 Which of the following best describes the group or person you represent?

Peak industry body

**If other, please specify.:**

#### 7 Which of the following best describes the sector you represent?

Forestry

**If other, please specify.:**

#### 8 Are there specific parts of your submission that you want to keep confidential?

**If yes, please outline which specific parts of your submission must be kept confidential and explain why. :**

### A State native vegetation policy

#### 9 Referring to the proposed policy objective statements below, how well do you support each one in guiding our development of a policy?

**Objective 1 matrix - Objective 1:**

Strongly supported

**Please explain in the text box below.:**

Any objective that seeks to strike a balance makes logical sense. The test of course is how to achieve this balance fairly, and without undue cost.

**Objective 2 matrix - Objective 2:**

Strongly supported

**Please explain in the text box below.:**

Again, can't knock this objective, provided it is strategic as stated, and doesn't unnecessarily hinder sustainable industries such as forestry.

**Objective 3 matrix - Objective 3:**

Strongly supported

**Please explain in the text box below.:**

Again, supported by the IFA/AFG. This is the approach taken in the current and previous 10 year Forest Management Plans which have ensured a

Comprehensive and Adequate Reserve system in our south-west forests. Given this, the IFA/AFG questions the need for the McGowan government to expand the conservation estate in the south-west forest areas (eg there is no basis from a vegetation management viewpoint to expand the Wellington National Park. It seems to the IFA/AFG that this is being pushed to satisfy the personal wishes of a small minority of locals.)

## **10 What opportunities are presented by the development of a State Native Vegetation Policy focused on how government manages vegetation?**

**Please provide your answer in the text box below.:**

Hopefully a State Native Vegetation Policy will enable government to realise that forests in the south-west of the State, including those on private property, will need increasing levels of management as the south-west continues its reducing rainfall trend. Specifically, management will need to include (1) ecological thinning as detailed in the government's recently released Djarlma Plan, and (2) an increased focus on fire management, as demonstrated by the recent bushfires in the eastern states where, clearly, a lack of hazard reduction in forested areas has led to tragic consequences. The IFA/AFG is pleased that government in WA is supportive of hazard reduction burning, although more needs to be done, especially in the karri forest region.

A particular opportunity that an improved native vegetation policy will hopefully enable is for private owners of native forest in the southwest to ecologically and sustainably manage their forests without having to be subjected to the onerous and expensive processes involved with the current "clearing permits". The current system is designed for actual "clearing" of vegetation, not silvicultural management of a forest, and the approx. 1000% hike in application fees from 1 July 2019 was, frankly, outrageous. Owners of private native forest need to be encouraged to manage their forests properly, not discouraged. Not only are private native forest owners subjected to an application fee of, typically, \$2000 to treat a patch of forest between 10 and 50 hectares (the previous application fee was \$200), but they are also required to hire a professional forester in most instances, at more expense, to assist them in the onerous process of obtaining a permit. A new, modernised native vegetation management policy for private landowners in the south west bioregion wishing to sustainably manage and improve their forest should embrace the following principles:

- (1) Doing nothing (as seems to be the current policy from DWER) is a poor option, especially given a reducing rainfall trend, past exploitation of private forests in many cases, and threat from bushfire.
- (2) Private forest owners should be encouraged to manage their forests by carrying out proper silviculture and fire management practices, not discouraged.
- (3) Application fees should be minimal.
- (4) A completely new application form needs to be developed which does not include the word "clearing" but instead "sustainable forest management", or "forest enhancement".
- (5) The role of DWER should be minimal, especially if the landowner has engaged the assistance of a suitably qualified forester or similarly experienced person in the development and submission to DWER of a proper management plan. (Note that foresters have often assisted landowners in the past and, as part of that process, have used pro-formas such as the one appended to this submission. You can see by a brief perusal of this pro-forma that the current DWER "clearing permit" application form is of no value to a landowner wishing to manage his forest sustainably.)

## **Better information**

### **11 How do you use native vegetation data within your sector? (Choose as many options as you require)**

To inform applications to clear or impact vegetation, Other

**If you have chosen 'other', please specify:**

The IFA/AFG is a strong supporter of the long-term biodiversity monitoring programme carried out by DBCA, known as "ForestCheck". This programme monitors the effects of disturbance from timber harvesting and prescribed burning on a series of sites across the whole of the south-west jarrah forest. We are encouraged by the results to date which show that there are no long term deleterious effects on biodiversity due to sustainable timber harvesting and prescribed burning. This is important and highlights the difference between permanent clearing and sustainable forest management. It also highlights why the IFA/AFG is pushing for a new regulatory approach from DWER to private land owners who wish to improve their native forests, not permanently "clear".

### **12 Which of the following elements of better information provision would be most relevant to your sector? (Choose as many options as you require)**

Cost saving, Timeliness of assessments, Evidence-base for decisions

**If you have chosen 'other', please specify:**

As above.

IFA/AFG recommends that private landowners wishing to improve and sustainably manage their native forests be encouraged to do so by: (1) DWER creating a new application form which caters for such a purpose, and (2) reducing the application fees considerably. A new application form should require the applicant to provide a brief management plan which includes the proposed silvicultural prescription, how any harvesting is to be conducted, and how fire is to be managed. The current application form is totally deficient in these respects.

### **13 What other opportunities are presented by improved information and improved access to information?**

**Please provide your answer in the text box below.:**

## **Better regulation**

### **14 Which of the following elements of better regulation would be most important to your sector? (Please rank your top three)**

**Rank better reg elements - Improved protection for native vegetation:**

**Rank better reg elements - Ensuring development is sustainable:**

**Rank better reg elements - Streamlined regulation for cost saving:**

1

**Rank better reg elements - Clearer requirements for business certainty:**

**Rank better reg elements - Improved assessment timeframes:**

3

**Rank better reg elements - Transparent, evidence-based decisions:**

**Rank better reg elements - Improved compliance and enforcement of unauthorised clearing:**

**Rank better reg elements - Equitable treatment of all proponents:**

**Rank better reg elements - Confidence in the regulatory system for all stakeholders:**

**Rank better reg elements - Other:**

**If you selected Other, please provide further information.:**

## **15 What other opportunities are presented by better regulation?**

**Please provide your answer in the text box below.:**

Better regulation per se should not always be DWER's priority. In the case of owners of private forest in the south west, DWER should be encouraging the landowners to take steps to better manage their forests. This means not treating silvicultural/ecological thinning as "clearing" which should be avoided, and not charging exorbitant application fees. DWER needs to take note of the government's Djarlma Plan with respect to south west native forests, and tailor its approach to native forests accordingly.

## **A bioregional approach**

### **16 Which of the following elements are the most important to you/your sector? (Please rank your top three)**

**Rank bioregional elements - 1. Transparent outcomes and objectives:**

1

**Rank bioregional elements - 2. Leveraging local knowledge:**

3

**Rank bioregional elements - 3. Strategic and innovative approach to conflicting interests:**

**Rank bioregional elements - 4. Clear targets and thresholds:**

**Rank bioregional elements - 5. Planned approach to dealing with cumulative impacts:**

2

**Rank bioregional elements - 6. Effective monitoring and evaluation framework:**

**Rank bioregional elements - 7. Supporting public-private partnerships for conservation:**

**Please explain in the text box below.:**

1. DWER needs a transparent outcome/objective for management of private native forests in the south west. At the moment, it is clear that DWER does not favour any management activity to be carried out in these forests, as demonstrated by the current application process and fee structure. This suggests there is an underlying distrust of private forest owners by DWER and a lack of understanding of the importance of adaptive management on these forests, as outlined in the Djarlma Plan. A new native vegetation management policy will hopefully rectify this situation.

2. This element picks up the issue of bauxite mining in our high quality jarrah forests. The IFA/AFG see this issue as particularly difficult given the economic value to the State of bauxite mining, at the same time as approx. 1000 hectares of forest is destroyed each each year. Note that the word destroyed is used because bauxite mining doesn't silviculturally thin the forest, it doesn't clear the forest, it removes the forest in its entirety and then removes the underlying soil. Planting of trees on the mined land by the mining companies involved is carried out to the best of their ability, but whether or not the "new forest" will ever develop into a forest similar to the pre-existing forest remains to be seen, especially given the disruption of the underlying soil profile.

3. The IFA/AFG would encourage the use of local Aboriginal knowledge in carrying out prescribed or controlled hazard reduction burning in south west native forests, particularly forests managed by local governments and other authorities close to towns.

### **17 What other opportunities are presented by a bioregional approach?**

**Please explain in the text box below.:**

### **18 What concerns are presented by a bioregional approach, for your sector?**

**Please explain in the text box below.:**

## Other initiatives

### 19 What initiatives do you think would work best to improve native vegetation outcomes in your region?

Private land management, Other

#### Please explain in the text box below.:

1. The IFA/AFG strongly encourages government/DWER to recognise the importance of encouraging owners of private native forest in the south west to actively manage their forests to improve the health and resilience of those forests in a drying climate. This means a new permit application system with reduced fees. The IFA/AFG is prepared to work with DWER to develop a new system.

2. Government/DWER should fully embrace the Djarlma Plan initiative for all native forests in the south west. Although the development of new local industry to help achieve the goals set out in this plan is admirable, if local industry is not forthcoming then government should accept that some export of timber product will be necessary in order to achieve the native forest management objectives outlined.

3. Fire management is critically important. Government and DWER need to keep this at the forefront of all thinking with respect to native vegetation management policy formulation. As demonstrated so starkly over recent months in the eastern states, if the threat of bushfire is ignored or not taken into serious consideration, the damage to vegetation - and wildlife - can be immeasurable. Again, the importance of ecological thinning cannot be overstated, and DWER's regulatory systems need to be cognisant of this.

### 20 What else could be done to improve the management of native vegetation to arrest the decline of native vegetation extent and condition?

#### Please provide your answer in the text box below.:

## Upload a document

### 21 If you would like to upload a document to support your submission, please upload it here.

#### Upload document 1 here.:

Vegetation managaement pro-forma.doc was uploaded

#### Please describe which question(s) document 1 relates to. :

10

#### Upload document 2 here.:

No file was uploaded

#### Please describe which question(s) document 2 relates to. :

# Pro-forma

## Management Plan for the Sustainable Use of Native Vegetation

### **Background:**

There are approximately 200,000 hectares of privately owned native forest in Western Australia. Areas of forest may be managed for many purposes, provided that any necessary development or environmental approvals are obtained. These will normally only be issued where the purpose is environmentally sustainable. Purposes range widely from aesthetic values to honey production and from conservation values to timber production. In many cases landowners will manage for multiple benefits. This pro-forma is designed to assist landowners who want to prepare a forest management plan that includes sustainable timber production as one of the owner's management goals. Completion of the pro-forma is also part of the process of obtaining a licence under the Wildlife Conservation Act and any other relevant environmental regulations.

The overall goal is the long term health of privately owned forest. There is the potential to address the problem of inappropriate and unsustainable use of remnant forest for timber production. The main forest types – jarrah/marri, wandoo and karri – are being targeted.

A booklet entitled *“How to Develop a Plan for the Sustainable Use of Native Vegetation”* will provide background information and guidelines on preparing a plan and seeking permission to proceed. An approved forest management plan is a requirement of a licence for timber harvesting issued under s.23D of the *Wildlife Conservation Act*. The forest management plan must address the principles listed in Schedule 5 of the *Environmental Protection Act*, as the Minister shall not issue a licence if the activities covered by the licence would be seriously at variance with these principles. Note that harvesting of native timber is considered clearing under the *Environmental Protection Act*.

Note, a forest management plan is not required where the timber is isolated paddock trees or other areas where forest management practices are not practical, but information will still need to be provided on the proposed harvest, and any potential impact on the environment. Applicable sections in the following management plan may be used for this purpose.

### **Principles from Environmental Protection Act**

1. Native vegetation should not be cleared if it comprises a high level of biological diversity.
2. Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.
3. Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, significant flora.
4. Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of a significant ecological community.
5. Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.
6. Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.
7. Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.
8. Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.
9. Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.
10. Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence of flooding.

## Management Plan for the Sustainable Use of Native Vegetation

<b>Name of applicant:</b>	.....
<b>Address of applicant:</b>	.....
<b>Location of property:</b> i.e. where the native forest or native timber is located	<ul style="list-style-type: none"> <li>• Location numbers .....</li> <li>• Road address .....</li> </ul> Include copy of aerial photo with forest area to be managed marked.
<b>If you are not the owner of the property, please provide details of the property owner.</b>	Landowner's Name: ..... Postal Address: ..... You will also need to provide written confirmation from the property owner that you have authority to harvest timber from the property.
<b>Type of forest:</b> (tick one or more boxes)	Jarrah/marri <input type="checkbox"/> ; wandoo <input type="checkbox"/> ; karri <input type="checkbox"/> ; other.....
<b>Area of forest:</b>	Area to be managed for sustainable use: .....hectares Total area of forest on the property: .....hectares
<b>Forest inventory</b> Please attach any assessment reports or other information relevant to an assessment of the property.	<ul style="list-style-type: none"> <li>• Has the forest been assessed - yes <input type="checkbox"/>, or no <input type="checkbox"/>?</li> <li>• If so, what data has been collected – flora/vegetation <input type="checkbox"/>; fauna <input type="checkbox"/>; soils/geology <input type="checkbox"/>; water resources <input type="checkbox"/>; dieback occurrence <input type="checkbox"/>; trees/ha <input type="checkbox"/>; basal area <input type="checkbox"/>; other.....</li> </ul>
<b>Catchment classification:</b> Catchments may be gazetted under the Country Areas Water Supply Act.	Located in a gazetted catchment: yes <input type="checkbox"/> , or no <input type="checkbox"/> ? Note that areas located in a gazetted Country Area Water Supply Catchment also require a licence under the CAWS Act.
<b>Clearing approval:</b>	Do you have approval to clear the vegetation: yes <input type="checkbox"/> , or no <input type="checkbox"/> ? If applicable, please attach a copy of the approval to clear the vegetation.
<b>Management issues identified for the forest areas:</b> Practices that may degrade the remnant, including grazing or frequent fire, may be considered to be clearing under the EP Act. Contact the Native Vegetation Protection Group for further information on freecall 1800 061 025 or visit the website at <a href="http://www.environ.wa.gov.au">www.environ.wa.gov.au</a>	Which management issues are relevant to the forest areas: <ul style="list-style-type: none"> <li>• Sustainable timber production/silviculture <input type="checkbox"/></li> <li>• Intact vegetation understorey <input type="checkbox"/></li> <li>• Rare &amp; endangered flora <input type="checkbox"/></li> <li>• Known native fauna habitat <input type="checkbox"/></li> <li>• Weed infestation <input type="checkbox"/></li> <li>• Feral animals (foxes, rabbits) <input type="checkbox"/></li> <li>• Dieback/disease control <input type="checkbox"/></li> <li>• Need for rehabilitation of native vegetation <input type="checkbox"/></li> <li>• Potential for stock grazing within forest <input type="checkbox"/></li> <li>• Controlled burning/fire hazard <input type="checkbox"/></li> <li>• Soil erosion (eg steep slopes) <input type="checkbox"/></li> <li>• Water quality (eg salinity risk) <input type="checkbox"/></li> <li>• Other ..... <input type="checkbox"/></li> </ul>



<b>Site management and protection</b>	<p>What measures will be used to encourage and protect regeneration, such as creating gaps and ash beds, and protecting young seedlings from grazing livestock?</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
<b>Environmental management</b>  (e.g. rare flora, fauna habitat, weeds, feral animals, dieback, fire, erosion and water quality)	<p>For those management issues identified above, that have not been addressed in the description of silvicultural management, describe the management that will be implemented to ensure the environmental sustainability of the harvest operation:</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
<b>Monitoring and auditing</b>  (e.g. setting up photo points, repeating surveys, or reassessing vegetation quadrats to demonstrate regeneration, weed control and maintenance of vegetation health.)	<p>What measures will be used to demonstrate that the management plan has been properly implemented, and the harvesting has been sustainable?</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
<b>Time frame:</b>	<ul style="list-style-type: none"> <li>• Proposed commencement date.....</li> <li>• Proposed completion date.....</li> <li>• Is management expected to be on-going: yes <input type="checkbox"/> or no <input type="checkbox"/>?</li> <li>• If on-going, - for 5 yrs <input type="checkbox"/>, 10 yrs <input type="checkbox"/>, 20 yrs <input type="checkbox"/> or.....yrs?</li> </ul>