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Dear [REDACTED],

NATIVE VEGETATION IN WESTERN AUSTRALIA – ISSUES PAPER

The Forest Industries Federation of WA (FIFWA) is the industry association for the timber industry in Western Australia. Our membership includes all the major companies and businesses that operate in the WA timber industry, including commercial plantation growers and managers, harvest and haulage operators, and timber processors in both the plantation and native timber industry sectors.

We welcome this opportunity to provide comment on the *Native Vegetation in Western Australia – Issues Paper*.

Overview

The *Native Vegetation in Western Australia – Issues Paper* explains the State Government has responded to concerns over native vegetation with plans for four particular initiatives, and the discussion paper invites comment around those initiatives.

There is however a broader conversation which needs to take place around managing native vegetation, informed by the disastrous bushfires which have unfolded (predominantly in eastern Australia) during this summer. It would be an omission of epic proportions if the bushfire tragedy is not taken into account through this native vegetation consultation process.

In the context of fire prevention and mitigation, references in the issues paper to the dramatic expansion of the conservation estate by the State Government invites contemplation of the horrific scenes which have emerged in NSW and Victoria, of fires surging out of national parks and reserves, and revelations of long-term failings in meeting fuel reduction targets.

The WA Government is to be commended for its Enhanced Prescribed Burning Program, and without

such significant fire mitigation measures embedded, the wisdom of any expansion of conservation areas must be questioned. Tactics such as mechanical fuel reduction should be a crucial element of the fire mitigation arsenal.

We welcome the establishment of the Bushfire Centre of Excellence in WA, and we expect significant findings to emerge from bushfires Royal Commission recently announced by the Prime Minister.

We will respond below to the four initiatives outlined in the *Native Vegetation in Western Australia – Issues Paper*.

1. A State native vegetation policy

The three proposed policy objectives attached to the State native vegetation initiative are at a sufficiently high level to be broadly acceptable. But as always, the challenge with respect to these proposed policy objectives lies in the implementation.

Terms such as “strategically conserved” and “strategic protection” have traditionally been associated with the withdrawal of active management from forests and woodlands usually leading to a deterioration of ecological values. Such deterioration is characterised by pest animal and plant infestations, elevated flammable fuel loads, and unsustainably dense regrowth forests and woodlands.

A State native vegetation policy should include specific reference to key elements of the *Djarlma Plan for the WA Forestry Industry* released by the State Government in July 2019. Amongst other matters, the *Djarlma Plan* underlines the importance of ecological thinning to improve forest health and resilience. Ecological thinning is a key remedy to the dramatic decline in winter rainfall over many decades and the excessive density of regrowth forests.

2. Better information

The timber industry makes prodigious use of data in all aspect of operations, and the government should be encouraged to implement the best platforms to capture data regarding the status of native vegetation.

The industry would welcome efficiencies that would flow from improved data gathering by the state, for example in better decision making, cost savings and more timely assessments.

Consideration of “Better information” with respect to managing native vegetation should include the concept of natural capital accounting. The *Djarlma Plan* (2019) has as a key immediate action to “investigate natural capital accounting concept and its application in WA. The objective is to develop a methodology that fosters an understanding and awareness of all forest values enhanced through timber production activity”.

3. Better regulation

The state’s regulatory framework relating to native vegetation appears excessively cumbersome, lacking the capacity to adequately distinguish between “clearing” and silvicultural interventions like ecological thinning, which deliver commercial timber production and improved environmental

outcomes.

The recent dramatic increase in clearing permit application fees has created a perverse disincentive for forest owners to implement proven strategies to enhance the health and resilience of their native vegetation.

4. A bioregional approach

The issues paper includes this quote: *Strategic bioregional planning could present solutions for a range of challenges that affect industry, the community and government, for example by: dealing strategically and innovatively with difficult trade-offs which pit public safety against biodiversity outcomes, such as roadside clearing in extensively cleared landscapes.*

“Difficult trade-offs” which have been thrown into stark relief during this summer of wildfires appear to be those where management decisions have compromised community safety for the supposed “protection” of biodiversity outcomes. Admittedly, this evidence is emerging in states other than WA.

The national conversation on bushfires, at least that informed by evidence, has arrived at the point of recognising that bushfire mitigation efforts need to be “land tenure agnostic”.

So whilst the issues paper advances the case for a bioregional approach providing solutions, there needs to be more discussion of the bioregional approach in the context of bushfire mitigation.

Thank you for the opportunity to provide this response to the *Native Vegetation in Western Australia – Issues Paper*, and we look forward to further engagement with the department over future iterations of this important topic.

Yours sincerely,



Matt Granger
Chief Executive Officer (Acting)

