



# Regulatory Impact Statement

## Office Use Only

TRIM Number

RG Number

Date Received

RGU Officer

## Information

## Submissions and Queries

**Name of Proposal**

Forest Management Plan 2014-2023

**Department/Agency**

Department of Parks and Wildlife

**Name of Contact**

John Loney

**Position**

Senior Principal Policy and Projects Officer

**Postal Address**

Department of Parks and Wildlife

Dick Perry Drive Kensington WA 6051

**Email**

john.loney@dpaw.wa.gov.au

## RIS Details

**Consultation RIS Lodged**

16 July 2012

**Consultation Start Date**

15 August 2102

**Consultation End Date**

7 November 2012

**Consultation Web-Link**[www.dpaw.wa.gov.au](http://www.dpaw.wa.gov.au)**Decision RIS Lodged**

1 October 2013

## Executive Summary

It is a statutory requirement under the *Conservation and Land Management Act 1984* (CALM Act) that a Forest Management Plan be produced every 10 years. The Noongar people are the traditional Aboriginal custodians of the plan area, which covers all land categories vested in the Conservation Commission across the State's south-west, within the Swan, South West and Warren regions of the Department of Parks and Wildlife plus the lands collectively referred to as 'Redmond' forest block within its South Coast Region. These land categories cover a total area of nearly 2.5 million hectares and the plan's focus is on the forests in the area from Lancelin to Denmark.

The current Plan expires at the end of 2013 and a process to develop the next plan is underway as set out in the CALM Act. This process calls for a public consultation and submission process and states that the Plan be guided by the principles of Ecologically Sustainable Forest Management (ESFM). These principles are:

*That the decision-making process should effectively integrate both long-term and short-term economic, environmental, social and equitable considerations. (Sustainability)*

*That if there are threats of serious or irreversible environmental damage, the lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. (Precautionary Principle)*

*That the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations. (Intergenerational Equity)*

*That the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making. (Conservation of Biodiversity and Ecological Integrity)*

*That improved valuation, pricing and incentive mechanisms should be promoted.*

Australia has adopted what is known as the Montreal criteria as the framework within which to set goals and proposed operations as they give expression to those principles and provide a common understanding of sustainable forest management. Section 2 'Objectives' below, sets out how the chapters in the plan reflects those criteria

A Consultation RIS was undertaken during the period June to August 2012, and took the form of a Social and Economic Impact Assessment (SEIA) Study by independent consultants. As part of that analysis, the consultants spoke with representatives of all the various industry sectors which operate in the area covered by the Forest Management Plan (FMP).

The Consultation RIS was accepted and the information in terms of potential job losses was included in the Cabinet Submission which approved the Draft FMP for release.

Extensive public consultation on the Draft FMP took place as outlined in the "*Analysis of Public Submissions on the Draft Forest Management Plan*" wherein each separate comment was analysed, a response prepared and an indication provided as to whether the Draft FMP was changed as a result of that comment. The introductory and summary pages to the "*Analysis of Public Submissions on the Draft Forest Management Plan*" (Analysis document) can be found at Appendix 1 and the complete document is attached. The document prepared as a result of the feedback and submissions received, is the "*Proposed Forest Management Plan 2014-2023*" (Proposed FMP) which is also attached as part of this Decision RIS.

The changes in the Draft FMP, compared with the current FMP, are set out in Section 3 "*Options to Address the Issue*" but include, in addition to specifying the volumes of timber to be harvested, changes to areas of national parks, additional protection for black cockatoos by retaining more marri trees, changes to protection areas around bike trails as well as operational issues such as the process for identification of old-growth forest. The analysis confirms that the only issue which was identified as having a socio-economic effect is the level of wood that can be harvested. No issues regarding reporting or compliance were raised.

It needs to be stressed that the decision on those annual wood volumes - the sustained yield - is based on the ESFM principles as set out above. The sustained yield figures were calculated using a specialised model –the Woodstock TM model - developed for the jarrah and karri forests. The objective was to calculate a sustained yield from woodflows averaged to 2070, taking account of the effects of climate change by using the best available CSIRO projections for temperature and rainfall, to 2070.

The process of calculating sustained yields was reviewed by an independent expert panel and the outcomes of the calculation process were supported.

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Hence the preferred option is the attached Proposed FMP, which includes the sustained yield for each of the main species and which has taken into account the public submissions as appropriate. It also includes a series of goals (which are set out in detail in Section 2 'Objectives'), management actions designed to achieve those goals and key performance indicators (KPIs) to measure achievement. These KPIs will be reported upon regularly and will be used when carrying out mid and end of term performance reviews of the FMP.

An implementation schedule has been drawn up within the department assigning responsibility for each of the management actions to divisions across the department and/or to other agencies as appropriate eg FPC, Conservation Commission. An Implementation Group has also been established to monitor budget, progress and report on the implementation as assigned. This group will be in operation before the next FMP commences, in order to ensure immediate ongoing implementation and monitoring.

The Decision RIS comprises this document, a copy of the *Proposed Forest Management Plan 2014-2023* (Proposed FMP), and a copy of the *Analysis of Public Submissions on the Draft Forest Management Plan*.

## 1. Statement of the Issue

The overall policy issue to be addressed is that the ongoing management of the forests is to be guided by the ESFM principles which are set out in the CALM Act. It is a statutory requirement under that Act that a Forest Management Plan be produced every 10 years and a process to develop the Plan is set out in the Act.

Each FMP, including this Proposed FMP, builds on the previous plan and introduces some changes in response to new scientific research or new issues arising eg the heightened importance of climate change. The changes in this Proposed FMP are listed in Section 3 *Options to Address the Issue*. The only significant issue as confirmed by the consultation process is the establishment of a sustainable wood yield, which sets the annual average volume of wood for each main species which can be harvested each year over the 10 year period of the plan. In the absence of a volume being established, there is the potential danger of over harvesting of the forest, resulting in a non sustainable industry in the longer term.

The principal issue to be addressed therefore in the context of the Regulatory Impact Assessment process is the level or volume of wood, particularly if it is set at a level lower than in the Forest Management Plan 2004-2013. It has the potential to have adverse socio-economic effects in the area covered by the plan by affecting in a direct manner the native forest products industry –tree fellers, haulage contractors, sawmills etc., but also all industry sectors operating in the area covered by the plan.

A Social and Economic Impact Assessment (SEIA) Study was undertaken by independent consultants and publicly released at the time of the release of the Draft FMP for public consultation and submission. This was designed so that the public would be able to better understand the potential impacts if the Draft FMP were to be implemented in that form.

The sectors consulted included the native forest products industry, tourism and recreation, apiarists, firewood collectors, basic raw materials (gravel, sand and limestone), craftwood, wildflower and seed collecting. The advice from that study, based on feedback from those consulted, was that the only issue in the FMP which could have an effect on the industry sectors and communities in the FMP area was the volume of native forest wood which could be harvested and that would affect only the operations of the native forest products industry. Industries such as tourism and recreation which rely on visitations to national parks in the FMP area for example did not identify any changes in the Draft FMP which would affect that industry.

In the discussions as part of the study, the potential volume of timber which could be harvested was indicated within ranges of upper and lower possibilities. Advice from the timber industry was that any increase in the available volume would provide additional security to the industry. Any reduction however, in the available volume, below that volume currently available, would have negative effects on industry viability and would lead to job losses. These potential losses were quantified in the Consultation RIS by number and location. Significantly, the timber volume for each the main species now finalised in the Proposed FMP is now specified not as a range, but as a precise figure which falls within the earlier ranges, and hence it can be concluded that the ultimate potential effects have been accurately canvassed in the Consultation RIS and remain valid for the Decision RIS.

Public Consultation was held with all sectors, and over 5000 submissions were received and considered in the drafting of the Proposed FMP. Section 5 below contains considerable detail on the consultation and the submissions, the vast majority of which was focused exclusively on environmental issues. Those submissions which did comment on socio-economic matters confirmed that the principal issue was the potential consequence if the level of timber made available was not sufficient to maintain a viable native forest products industry.

## 2. Objectives

The broad objective is as outlined above, ie the ongoing management of the forests in line with the principles of ESFM as set out in the CALM Act. These principles require, among others, that the conservation of biological diversity and ecological integrity should be a fundamental consideration and that decision-making integrate short and long term economic, environmental, social and equitable considerations. As stated above, Australia has adopted what is known as the Montreal criteria as the framework within which to set goals and proposed operations as they provide a common understanding of sustainable forest management.

The chapters in the Proposed FMP broadly reflect those criteria and indicate the range of potentially competing objectives within that overall objective and which the plan attempts to meet. The chapters and the goal or objective of each chapter are quoted below. Certain subsidiary goals have been indicated where appropriate.

### **Biological diversity**

- An overall goal of the plan is to seek to conserve biodiversity and self-sustaining populations of native species and communities, and to allow for the recovery of biodiversity from disturbance operations

### **Ecosystem health and vitality**

- An overall goal of the plan is to seek to maintain ecosystem health and vitality
- The plan proposes a series of activities at the whole of forest, landscape and/or local scales, for the purpose of seeking to use and respond to fire in a manner that promotes the maintenance of ecosystem health and vitality, the conservation of biodiversity, and mitigates the risk of adverse impacts of bushfire
- The plan proposes a series of activities at the whole of forest, landscape and/or local scales, for the purpose of seeking, as far as is reasonable and practicable, to:
  - minimise the impact of weeds/pests/diseases<sup>1</sup> on ecosystem health and vitality, including plantations
  - minimise the risk of introduction or naturalisation of weeds/pests/diseases and protect those areas currently free of infestation
- The plan proposes a series of activities at the whole of forest, landscape and/or local scales, for the purpose of seeking to develop and maintain self-sustaining ecosystems of native species from rehabilitation operations in areas of native vegetation, and ameliorating the impacts of other threats, including the impacts of climate change

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<sup>1</sup>There are separate activities for each of weeds, pests and diseases in the FMP, but they are not repeated here as they are virtually identical

### **Soil and water**

- An overall goal of the plan is to seek to protect soil and water resources on land to which the plan applies

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

- Within the constraints of a changing climate, the plan proposes a series of activities at the whole of forest scale, for the purpose of adapting to climate change and seeking to sustain the contribution of the areas covered by the plan to global carbon cycles, consistent with relevant legislation and the achievement of other goals

### **Productive capacity**

- An overall goal of the plan is to seek to sustain the productive capacity of native forest ecosystems and plantations as they progressively adapt to changing climate conditions
- The plan proposes the following activities at the whole of forest and local scales for the purpose of seeking to provide for production of jarrah and karri sawlogs on a sustained yield basis and to maintain the quality of the sustained yield calculations for the subsequent plan (from 2024)

### **Heritage**

- An overall goal of the plan is to protect and maintain Noongar and other Australian cultural heritage

### **Socio-economic benefits**

- The plan proposes a series of activities at the whole of forest scale for the purpose of seeking to contribute to the viability of the forest products industry and to provide regional socio-economic benefits

### **Plan implementation and management**

- An overall goal of the plan is to seek to ensure that management is undertaken in a systematic manner in accordance with the plan and is continually improved so as to achieve desired outcomes

Within each chapter, there are management activities designed to achieve those goals plus performance measures to measure that achievement. There may also be one or more subsidiary goals within a chapter.

## **3. Options to Address the Issue**

The development of that plan canvasses numerous options and proposed changes which could be introduced within the plan.

The Draft FMP as released for public consultation and submission included a number of planned changes from the current FMP as well as certain issues for which alternative management options were put forward.

In addition to the changes in the levels of sustained yield, the Draft FMP proposed a number of key changes from the current FMP. Some examples and reasoning behind the proposal are set out:

- adding to the formal conservation reserve system by increasing the size of the national park in the Whicher Scarp area - to ensure adequate reservation of a newly recognised forest ecosystem
  - introducing improvements to silviculture guidelines, including greater protection of marri trees - to provide increased habitat for black cockatoos
  - revising travel route zones in the Department's Warren Region – to adapt to changing usage patterns
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- publishing a map on the Department's website each year of old-growth forest status and extent, identifying any variations - to demonstrate transparency
- reviewing the processes for planning for all disturbance operations on all land categories,- to ensure a consistent approach for checking for old-growth forest
- removing the phased harvesting requirement in the Department's Swan and South West regions, and parts of the Warren Region, - because of the reduced risk of salinity there is a reduced risk to stream water quality from harvesting operations
- making basic raw materials (BRM) available from a network of (fewer) strategic pits – to minimise both the area impacted and possible adverse environmental consequences
- formalising the inter-agency arrangements between the Department and the Forest Products Commission (FPC) - in order to demonstrate improved governance

Further changes were considered in the following examples where alternative management options were put forward in the Draft FMP for comment:

- informal reserves for the Munda Biddi Trail (two management options relating to the width of buffer zones)
- settings for fauna habitat zones (two management options relating to the design and area of the zones which are aimed at providing a rotating source of fauna to recolonise disturbed areas as they regenerate from timber harvesting)
- 'silviculture for water production' in selected catchments (two management options designed to increase the volume of water available for use depending on the areas chosen should the program proceed)
- arrangements for public firewood collection (three management options to manage unauthorised activity and departmental management costs).

Based on the responses and comments to these proposed changes and possible options, management activities have been included in the appropriate chapter of the Proposed FMP.

As indicated, the Draft FMP did contain the range of possible timber harvest levels and many of the responses, particularly those contained in the proforma submissions, requested the immediate cessation or the phasing out of native forest timber harvesting. Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM so the cessation or the phasing out of native forest timber harvesting was not adopted. Those options which, while primarily environmentally focussed, could have an effect on the sustained yield, eg fauna habitat zones, and travel route locations in the Warren Region, and for which comment was received, were built in to the calculation of sustained yield.

As indicated above, that calculation was carried out using a complex modelling process, incorporating the decisions on those relevant options plus the latest information on climate change and how that affects tree growth and hence sustained yield. The underlying data, structure and function of the model were examined by an Independent Expert Panel, and the method of calculation and the outputs were endorsed.

Within the Proposed FMP there is a series of management actions in each chapter, building on and enhancing similar actions in the Forest Management Plan 2004-2013, but modified and enhanced to take into account new issues (eg the growing importance of climate change in forest management), plus new learnings from the extensive research science program carried out within the department.

The Proposed FMP therefore represents the finalisation of all the options and changes considered, together with the most up to date climate change data, in order to deliver on the statutory requirement to manage forests with a plan which provides for sustainable forest management.

## 4. Impact Analysis

The changes put forward in the Draft FMP and carried through to the Proposed FMP have the potential to impact on the range of industries operating in the plan area.

This potential impact was examined in the Consultation RIS which took the form of the SEIA study, and all those industry sectors were considered. This included the native forest products industry as indicated but also the following sectors: tourism and recreation, apiary, wildflower and seed collection, craftwood and firewood collection, and basic raw materials (eg, gravel, sand and limestone). Mining is a significant industry in the plan area but mining activities are covered by other legislation and hence issues related to that sector were not deeply examined in the SEIA study.

Based on the feedback from the consultation, the only sector for which negative effects could be identified as a potential outcome of the implementation of the Draft FMP was the native forest products industry. The changes from the FMP 2004-2013 as listed above in Section 3, "*Options to Address the Issue*", were not considered to have any impact on any of the other sectors listed and consulted. Changes such as additions to national parks, to travel routes in the Warren Region, and increased habitat protection for black cockatoos were not seen as having an effect on the tourism and recreation sector or any other sector other than the timber industry.

Changes such as in the design and individual size and overall area of the fauna habitat zones (FHZs) have the potential to influence the volume of wood that can be harvested. The final design of the FHZs was taken into account when determining the sustained yield.

The study identified the number of potential job losses should there be a reduction in available native wood and further, identified the most vulnerable local governments areas. It is not only the actual volume of wood to be made available but also the quality and log size of the wood and the location from which it is sourced. These issues are discussed in detail in the SEIA study and are taken into account when quantifying the possible effects.

The key finding as reported in the study was that any reduction in the level of 1<sup>st</sup> and 2<sup>nd</sup> grade jarrah sawlogs in particular, and when the issues of log size and distance from source are considered, could make the industry unviable. The most likely outcome would be the closure of one of the three larger sawmills in Manjimup, Bridgetown or Nannup. Depending on which mill might close (which in turn would depend on the location of the source of the logs and hence the distance the logs are to be hauled which affects the delivery cost), direct job losses could reach 158 with further indirect job losses totalling 215. Conversely, should the availability of wood be increased, a higher level of security to the industry would be provided.

This information was made available to the Conservation Commission, to the Minister for Environment and to Cabinet when the Draft FMP was noted, prior to its release for public comment.

As noted earlier, the volume of available wood in the Proposed FMP, ie the sustained yield, is within the ranges on which the Consultation RIS was based. Specifically, the volume of 1<sup>st</sup> and 2<sup>nd</sup> grade jarrah is within 1% of the level in the FMP 2004-2013 and for karri, the figure is 8% higher than the current level. On this basis, the estimate of potential effects, and specifically the potential for job losses, as identified in the consultation RIS remains valid.

Therefore based on the volume of sawlog to be available under the Proposed FMP, there should be no job losses which can be attributed to the implementation of the FMP.

As noted above, in parallel with the impact of the volume of available native timber, there are cost impacts which arise due to differing access to available wood in terms of the quality, location and distance to sawmill of the wood. These impacts are not a consequence of, nor can they be attributed to, this FMP but would have happened irrespective of the FMP, due to past policy decisions, most notably the decision in 2001 to stop harvesting and protect all old-growth forests.

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It should be noted that there has been a new concept introduced into this plan and that is an 'upper limit' of wood that can be harvested. This situation arises because the manner in which the forest is managed (the silvicultural practices applied), has an effect on the sustained yield, which is specified as the volume of 1<sup>st</sup> and 2<sup>nd</sup> grade sawlogs, plus the volume of lower grade wood, known as "other bole" wood, which can be sustainably harvested. This "other bole" wood is obtained in the course of harvesting 1<sup>st</sup> and 2<sup>nd</sup> grade sawlogs. By introducing an "upper limit", this FMP provides the potential for higher cuts of sawlogs and non sawlog material should new markets be identified for this lower grade wood, which would depend on new products being developed. This would provide increased security to the native forest products industry. This potential applies particularly to jarrah and importantly, remains within the defined sustained yield. It is the 'upper limit' of the sustained yield, specified in terms of cubic metres per annum as normal, but calculated under a different silviculture regime.

In terms of the impact of the Proposed FMP on government, management of the FMP and operating within the FMP represents a large part of the workload of several work units within the department. Many of the management activities in the Proposed FMP are built on or develop from management activities in the FMP 2004-2013 and represent a continuation of the existing work of the department and the FPC. Contributing to the development, recording and maintenance of databases, administration of leases and the management of education programs are examples of the ongoing work of the department and no additional costs are anticipated.

There are however certain proposed activities which may incur additional costs. These costs are currently being determined and will be the subject of a Cabinet Submission if an internal reallocation of funds cannot provide the funds required. Based on legal advice, the wording of the management activities has been carefully framed and includes the phrase "...seeks to..." throughout the document. This is in line with the fact that a management plan under the CALM Act is an enabling document and the management activities are designed in that context. The department will undertake the activities to the maximum extent possible within the available resources.

## 5. Consultation

There were several sets of consultation as part of the overall process in developing the Proposed FMP.

The first was a round of non statutory consultation undertaken in late 2011 prior to drafting the Draft FMP. A range of organisations and agencies were consulted and the information gained was used in preparing the Draft FMP.

The second round of consultation was part of the SEIA study, which concentrated on the social and economic impacts. The methodology, eg who was consulted, the consultation template, the responses and the potential impacts of the implementation of the Draft FMP - is outlined in that document. The study formed the Consultation RIS and its release was timed to provide supporting information at the time of the second consultation process which is required under both the CALM Act and the EP Act. The RGU considered the consultation satisfactory. A list of those consulted individually is set out below.

Stakeholder group	
State Government	Forest Products Commission
	Department of Environment and Conservation
	Department of Mines and Petroleum
	Department of Water
	Main Roads WA
	Tourism WA
	South West Development Commission
Local Government	Shire of Manjimup
	Shire of Bridgetown-Greenbushes
	Shire of Nannup
Timber industry	Auswest Timbers
	Whittakers Sawmill
	Yornup Sawmill
	Middlesex Sawmill
	Nannup Sawmill

	Whiteland Sawmill
	Inglewood Group
Harvest and haulage	Falcon Group
	Dawson's Contracting
Manufacturers	Jamel Furniture
	Inglewood Group
	Brooker Furniture
Community	Timber Community Australia
	Warren –Blackwood Strategic Alliance
Peak Body Groups	Forest Industry Federation of WA**
	Conservation Council of WA**
	Wilderness Society **
	WA Forest Alliance
Aboriginal groups	South West Aboriginal Land and Sea Council

\*\* declined to participate in SEIA study

The third round of consultation was a more broad ranging public consultation process and followed the methodology set out in the CALM Act. It also fulfils the consultation requirements under the EP Act.

The attached Analysis document outlines in detail this latter consultation, including public advertising, mail out of copies of the Draft FMP, public forums, the list of those consulted, the method of consultation, details of submissions received and the response to each submission, indicating if the Draft FMP was altered as a result of that submission. The introductory and summary pages to the Analysis of Public Submissions can also be found at Appendix 1.

In summary, all parties with a legitimate interest were consulted, all submissions analysed and taken into consideration in the redrafting of the Draft FMP which became the Proposed FMP.

## 6. Preferred Option

The Proposed FMP as attached has been produced following almost three years work. The preparation was carried out as required under both the CALM Act and the EP Act, and the final product is the preferred option.

While in essence the Proposed FMP is the only option in that it is required under the CALM Act, it has been prepared following wide ranging consultation both as part of preparation of the Draft FMP and then on the Draft FMP itself. Proposed changes and management options were put forward for consultation and comment. This has led to redrafting as appropriate in response to the submissions, to become the Proposed FMP.

Within the Proposed FMP, based on the feedback from all the consultation, the regulatory matter which has the potential for the greatest impact is the level of the sustained yield of wood. This has been calculated using a complex modelling system, in which many of the inputs are scientifically based.

The Draft FMP contained a number of specific options which related to the settings for the calculation of the sustained yield and the responses were built into the final settings.

The Proposed FMP represents the best possible trade off between the often competing requirements of the principles of ESFM

## 7. Implementation and Evaluation Strategy

The FMP 2004-2013 expires on 31 December 2013, and the FMP 2014-2023 must be finalised and implemented in order to commence operations on 1 January 2014. The plan is used within the Department to set work plans and is referred to on a regular basis.

The plan includes in each chapter, a goal or a series of goals, a set of management actions designed to achieve those goals, and key performance indicators (KPIs) to measure achievement. Throughout the document in total there are 134 management activities which include 262 sub-activities, and 24 KPIs with 50 separate performance measures. These KPIs will be used when carrying out the performance reviews of the progress of the FMP -the mid- and end -of -term reviews of the FMP by the Conservation Commission, the body in which the land, the subject of the FMP, is vested.

An implementation schedule has been drawn up within the department assigning responsibility for each of the management actions to divisions across the department and/or to other agencies as appropriate eg FPC, Conservation Commission. An Implementation Group has also been established to monitor, budget, progress and report on the implementation as assigned. This group will be in operation before the next FMP commences, in order to ensure immediate ongoing implementation and monitoring.

The Department has committed in the plan to work with the FPC to develop and implement formal working arrangements, and among other things, to define roles and responsibilities. The development of these formal working arrangements is well progressed.

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## Certification

**Name**

**Certified By**

Dr Geoff Stoneman

**Position**

Director Forest and Ecosystem Management, DPaW

**Phone Number**

9219 9379

**Email**

geoff.stoneman@dpaw.wa.gov.au

# Draft Forest Management Plan 2014-2023

Conservation Commission of Western Australia

Analysis of Public Submissions

on the

Draft Management Plan

April 2013



Department of  
**Environment and Conservation**



## Introduction

This document is an analysis of the public submissions to the *Draft Forest Management Plan 2014-2023* (Draft FMP).

The Draft FMP was released by the Conservation Commission of Western Australia (Conservation Commission) for a 12 week public review period from 15 August to 7 November 2012. This release and the supporting actions outlined below, meet the public review requirements for the *Forest Management Plan 2014-2023* required by section 57 of the *Conservation and Land Management Act 1984* (CALM Act), and by section 40 (4) of the *Environmental Protection Act 1986* (EP Act).

The release of the Draft FMP was supported by:

- ◆ media statements from the Minister for Environment and the Conservation Commission;
- ◆ advertising in *The West Australian* on 15 August and in four community newspapers throughout the south-west during that week and the week beginning 20 August and 23 October;
- ◆ publishing the draft plan on the Conservation Commission and the Department of Environment and Conservation (DEC) websites;
- ◆ a notice of release of the draft plan on the Environmental Protection Authority (EPA) website;
- ◆ emailing over 250 stakeholders with notice of release of the draft plan, including State Members of Parliament in the plan area;
- ◆ mailing the draft plan to stakeholders;
- ◆ providing copies to 12 public libraries throughout the south-west;
- ◆ making the draft plan available from DEC regional and district offices in the Swan, South West, Warren and South Coast Regions;
- ◆ making the plan available from the State Library, the JS Battye Library and DEC's Atrium Library and Conservation Library in Kensington;
- ◆ publishing, a range of supporting information, on the Conservation Commission and DEC websites including nine fact sheets, the social and economic assessment report undertaken by URS Australia Ltd and information sheets on sustained yield and estimating native forest carbon stocks.

During the review period three public information sessions and a series of targeted information sessions with key stakeholders were held. The public information sessions were held on Monday 10 September in Perth, Wednesday 12 September in Bunbury and Thursday 13 September in Manjimup.

Representatives of the DEC also attended meetings of the seven Aboriginal Working Parties representing native title claimants in the area of the plan and the South West Aboriginal Land and Sea Council.

## Analysis of submissions

A total of 5,141 submissions were received. Of these, 88 per cent reflected two pro forma submissions promoted by the Conservation Council of Western Australia (CCWA) and the Western Australian Forest Alliance (WAFA). Submissions were also received from individuals, companies, local government, government agencies and non-government organisations.

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The submissions have been considered and where appropriate comments or issues from the submissions have been reflected in the *Proposed Forest Management Plan 2014-2023* (Proposed FMP). The Proposed FMP will be assessed by the EPA under Part IV of the EP Act.

Table 1: Summary table of number and origin of submissions.

Category	Number
Pro forma A	2,724
Pro forma B	1,800
Pro forma (origin unknown)	9
Individuals and companies	553
Non-government organisations	31
Local government	12
Government agencies	12
<b>Total</b>	<b>5,141</b>

Pro forma A: Conservation Council of Western Australia

Pro forma B: Western Australian Forest Alliance

## Submission analysis

Submissions were reviewed to identify the comments and issues raised during the public review of the Draft FMP. These comments and issues were then assessed using the following criteria:

1. The draft plan *may be* amended if a submission:
  - a. provides additional resource information of direct relevance to management
  - b. provides additional information on affected user groups of direct relevance to management
  - c. indicates a change in (or clarifies) legislation, management commitment or management policy
  - d. proposes strategies that would better achieve management goals; or
  - e. indicates omissions, inaccuracies or a lack of clarity.
  
2. This draft plan *may not* be amended if a submission:
  - a. clearly supports the draft proposals
  - b. offers a neutral statement or no change is sought
  - c. addresses issues beyond the scope of the draft plan
  - d. makes points that are already in the draft plan or were considered during its preparation
  - e. is one among several widely divergent viewpoints received on the topic and the proposal in the draft plan is still considered the best approach; or
  - f. contributes options that are not possible (generally due to some aspect of existing legislation or government policy).

No subjective weighting has been given to any particular submission or comment that would give cause to elevate the importance of any submission or comment over another.

Pro forma submissions were reviewed to identify personalised comments additional to the comments made in the main pro forma. Eight hundred and forty nine (849) submissions included additional comment(s).

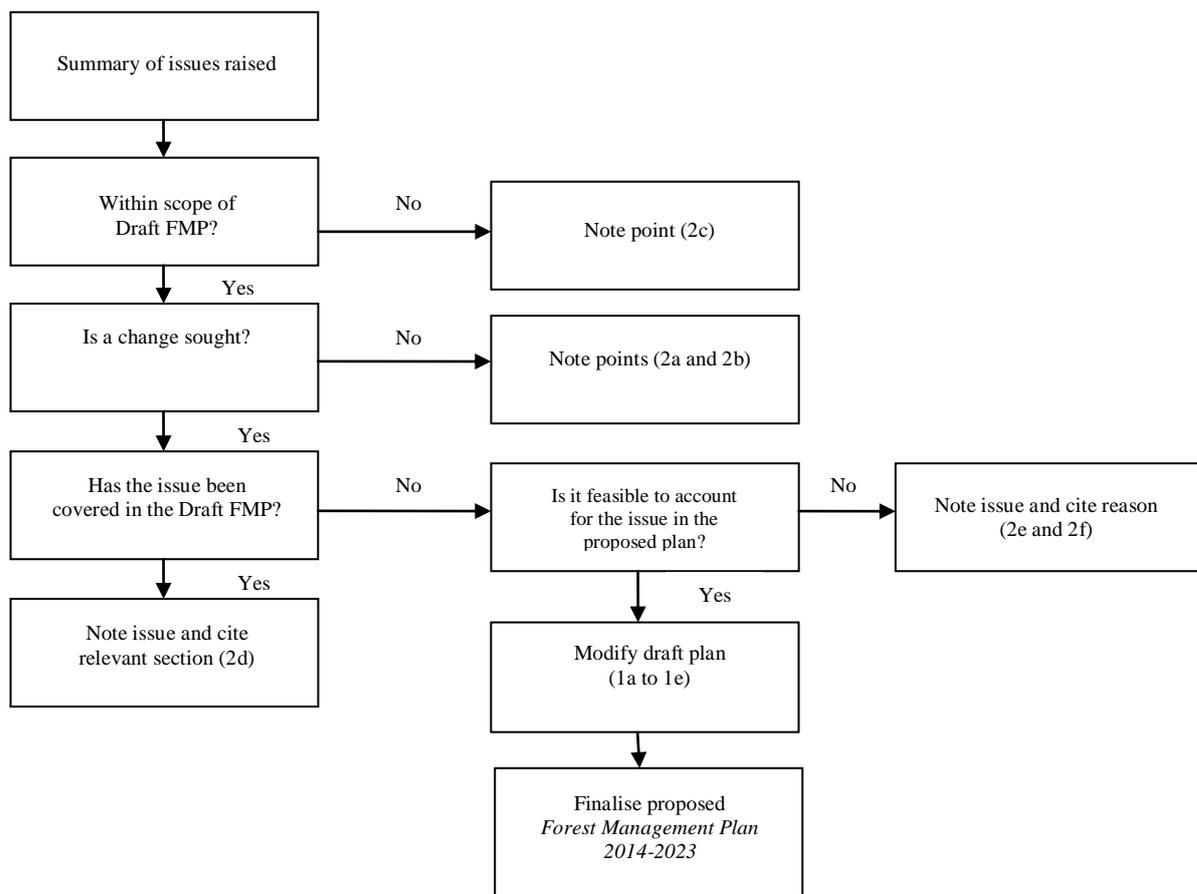


Figure 1: Analysis process

### Summary of comments

Five hundred and nineteen comments were identified in the analysis of submissions received on the draft plan. These represented a wide range of community opinion. Table 2 summarises these according to Draft FMP chapters.

Appendix 1 lists each comment, the comment theme, the criterion as listed above used to assess the comment, and a response to the comment. It should be noted that comments of a similar nature from different submitters have been summarised and grouped. As such, individual submitters may not be able to find their specific comment verbatim in Appendix 1.

Table 2: Summary of comments categorised

Chapter	Number of comments
General	64
Biological diversity	108
Ecosystem health and vitality	60
Soil and water	43
Climate change and carbon cycles	38
Productive capacity	91
Heritage	17

<b>Chapter</b>	<b>Number of comments</b>
Socio-economic benefits	48
Plan implementation	28
Key performance indicators	22
<b>Total</b>	<b>519</b>

## Comments received on proposed key changes and management options

The Draft FMP sought community input on a range of proposed management options associated with forest activities. The level of input received on these management options was lower than anticipated, with just over 300 comments. Where submissions did provide input, these comments have helped in preparing the Proposed FMP. The diversity of opinion on the management options reflected a wide range of community attitudes.

The proposed management options which attracted the largest number of comments related to fauna habitat zones (FHZ), (mainly opposed to the concept of FHZ), support for ‘silviculture for water production’ and support for at least the current level of allowable cut of wood products, although it should be noted that the two major proformas expressed total opposition to native timber harvesting.

Appendix 2a to 2c provides an overview of the comments received for and against the proposed changes, management options and sustained yield scenarios detailed in the Draft FMP.

## Pro forma submissions

As previously indicated, the majority of submissions followed two pro formas promoted by the CCWA and Wafa, a separate summary of the comments and responses to those proformas is at Appendix 3.

## Key themes identified from submissions

The main themes with a conservation focus are as follows:

- That the Draft FMP did not follow the principles of ecologically sustainable forest management or focused too strongly on productive capacity outcomes.
  - Opposed to timber harvesting in native forests for a range of reasons, including that it is not sustainable in a time of drying climate, the forest is not regenerating, it threatens fauna and flora habitat and it is economically unviable.
  - The impact of a drying climate was inadequately tackled in the management objectives, including the calculation of sustained yield of jarrah and karri sawlogs.
  - The option of carbon trading is not examined in the Draft FMP (nor in the social and economic impact assessment).
  - Questioned the adequacy of the scientific information and background data used to inform the Draft FMP. Primarily relating to the rainfall data used and the findings from FORESTCHECK which monitors the impact of disturbance (timber harvesting, prescribed fire) on biodiversity in the jarrah forest.
  - There should be a transition away from native forest timber harvesting to encouraging plantations/farm forestry.
  - Opposed to mining in south-west forests.
  - Supported the additions to the Whicher National Park. A number of submissions also suggested other areas for potential reservation.
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- The health and resilience of native forests has been compromised by the spread of disease and threats from pests.
- Prescribed burning poses an unacceptable risk to biodiversity and ecosystem health.
- There is a lack of appropriate enforcement powers and clear governance arrangements between the CCWA, DEC and the Forest Products Commission (FPC).

The main themes with an industry focus are as follows:

- The outcomes of the Draft FMP were strongly focused on conservation outcomes.
- There is already an excess of south-west native forest ecosystems represented in the conservation reserve system, above what is required (exceeds requirements of a comprehensive, adequate and representative [CAR] conservation reserve system).
- Request to ‘open up’ some forest areas currently set aside from timber harvesting, e.g. policy inconsistency when forest conservation areas allow for mining, beekeeping and wildflower picking, but are excluded from timber harvesting.
- Supported ongoing monitoring through FORESTCHECK and those findings from FORESTCHECK present evidence that timber harvesting is being carried out in a sustainable manner.
- Opposed the concept of FHZs or if retained, the number and area of FHZs should be reduced.
- More consideration needs be given to the social and economic consequences of reducing the allowable production levels for native forest timber harvesting reduction in the allowable logging level.
- Timber harvesting is part of a sustainable industry.
- The traditional timber towns are yet to recover from the last industry restructure.
- Alternative long-term employment options are limited.

Other major themes or comments:

- Some submissions identified editorial changes, format or style changes that will be considered in context of the proposed *Forest Management Plan 2014-2023*, should the detail of the Draft FMP be retained.
- It is important that the implementation of the final *Forest Management Plan 2014-2023* is adequately funded and resourced.
- A degree of operational fine-tuning may be required to ensure consistency between principles identified in the Draft FMP and silviculture guidelines.
- A range of comments suggested improvements to the key performance indicators.

In all there were 21 comments which were given a category 1 criterion as outlined above, and hence resulted in a change to the Draft FMP. These comments and an explanation of how the Draft FMP was altered can be found at Appendix 1.

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