DRAFT FOREST MANAGEMENT PLAN (FMP) 2024-33


Photo: Kim Reardon

WA FOREST ALLIANCE'S ASSESSMENT

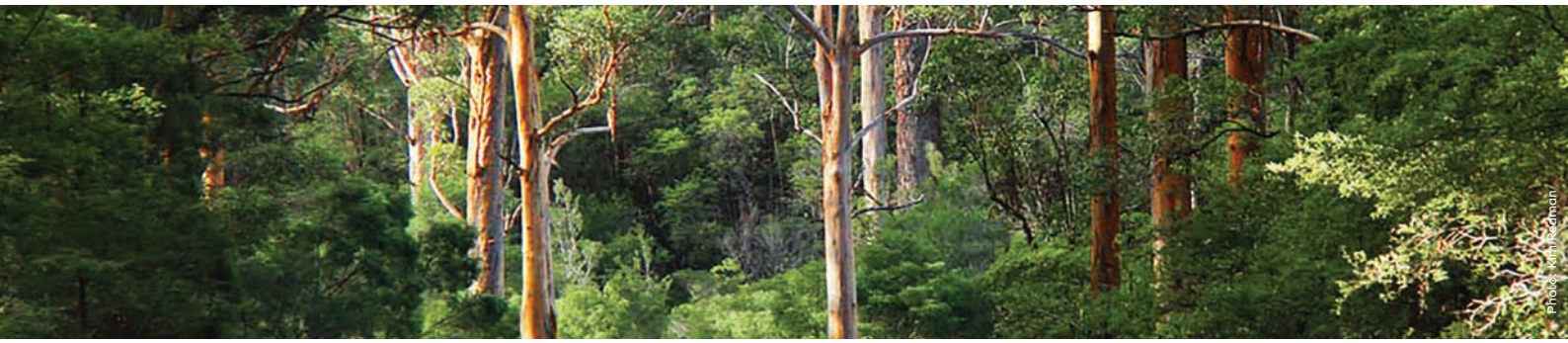

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Does the draft FMP protect WA's South West forests?

Overview

The draft Forest Management Plan (FMP) for 2024-2033 has been published and we are on track to ending native forest logging and protecting at least a further 400,000 ha of the South West's forests.

When logging finally ends in WA in 14 months' time, we will have:

- Prevented 6,500 ha of ancient forest from being logged every year – this is the equivalent of 9 football fields every single day.
- Ensured the protection of at least a further 400,000 ha of forests in secure protected areas.
- Protected nesting hollows, food supplies, roosting sites and other habitat for a huge number and diversity of forest wildlife, and
- Prevented more than 60 million tonnes of CO_2 from being emitted over the next decade.

This is an incredible achievement that would not have been possible without the work that everyone in the WA forest community has done over the years.

The draft FMP commits to four major tangible breakthroughs:

1. Ending native forest logging
2. Securely protecting at least a further 400,000 ha of forest in National Parks and other protected areas
3. Securing the protection of the 320,360 ha of National Parks and other protected areas promised under previous FMPs, and
4. Entering into cooperative, and joint management agreements with Traditional Owners across the forests.

The policy commitment to end native forest logging was ground-breaking. However, more work is needed, and this is evident in this draft plan.

The proposals for thinning and fire management and the conspicuous lack of proposed protection for the Northern Jarrah Forests - which are subject to out-dated and outrageous bauxite mining State Agreement Acts - are unacceptable and must be changed before the FMP is finalised.

The draft FMP is open for public comment until 18 December 2022, giving us all plenty of time to make considered and robust submissions.

You can find the draft plan and associated information on the DBCA website.

This is our best chance yet to protect what's left, and the future of the forests and their wildlife are depending on us acting now to get a world-class forest conservation plan in place.

There are two ways that you can enter your submission. You can:

- Sign on to WAFA's submission via https://bit.ly/WAFA-FMP-submission
- And you can also enter your own personal submission via email or online through the DBCA website using the assessment and recommendations we provide and preferably putting them in your own words.

We will be hosting a number of events and providing various materials, including this assessment, to help you with your personal submissions. Keep updated via our website, by signing up to our emails, and by following us on social media.

This document gives you our assessment of the major areas covered in the draft FMP. We haven't covered every section. Instead, we have aimed to provide a brief but meaningful assessment of the sections that have the greatest impact on the forests and that are directly managed by the FMP process. Don't hesitate to get in touch via forests@wafa.org.au

Yours for the forests,

The WAFA team


Photo: Steve Parish

SECTION 1:

New National Parks and other protected areas

The good news is that the draft FMP commits to creating at least 400,000 ha of new National Parks (NPs) and other protected areas, as well as to securing the protection of the 320,360 ha of forest ecosystems planned for under previous FMPs.

The secure protection of over 700,000 ha of forests will be monumental and unprecedented and is a major component of this FMP.

However, the draft FMP mapping of indicative areas for addition to the conservation estate lacks detail in the southern forests and doesn't indicate any new protection in the vast majority of the Northern Jarrah Forests (NJF), which are available for strip mining under outdated bauxite mining State Agreement Acts.

The neglect of the NJF is unacceptable. It is essential that forest ecosystems in this vulnerable and highly biodiverse part of the world are protected from mining and other threats and the FMP is the vehicle for achieving this. WA has prioritised the interests of bauxite mining giants Alcoa and South32 for too long. Allowing these multinational mining companies to determine whether forests can be protected is absurd and the Government must act to set aside a network of protected forests across the NJF region. It is time to act in the long-term interests of West Australians and the environment – not the short-term interests of mining companies.

The mapping by UWA environmental planner Daniel Martin, published by The Beeliar Group in October 2022, proposes a comprehensive network of protected forest ecosystems based on strong environmental planning principles and has been developed in consultation with the community, scientists and Traditional Owners. The FMP should use this work in planning the expanded conservation system.

It is also critical that all forests being considered for addition to the conservation estate are given immediate interim protection and that their final boundaries and land categories are gazetted as soon as possible. With the major increase in the number of exploration applications for lithium and other minerals across the South West, there is a real race on to move forests into land categories where they safe from mining applications.

Recommendations:

1. Use the mapping published by The Beeliar Group, and its strong basis in environmental planning, conservation science and community engagement as the basis for the design of the expanded conservation estate.
2. Commit to having the new National Parks (NPs) and other protected areas gazetted no later than the mid-term review of the FMP in 2028.
3. Set out clear processes for defining boundaries, land categories and co-management and vesting of new NPs and other protected areas in consultation with Traditional Owners and the community conservation sector.
4. Work with Ministers for Mines and Environment and DMIRS to immediately exclude mining from all potential future protected areas.
5. Create a network of NPs and Nature Reserves in the Northern Jarrah Forests to protect vulnerable forest ecosystems from the escalating threat of climate change and bauxite, gold, lithium and other mining, as well as major infrastructure projects.



SECTION 2:

Thinning

The draft FMP outlines the parameters for thinning and describes the management objective as being 'to promote forest health and resilience in order to conserve biodiversity.'

This new program has the potential to benefit unnaturally dense mine-site rehabilitation and immature regrowth forests, especially where hydrological and climatic factors mean that those areas are suffering water stress and drought impacts. However, the draft FMP does not limit thinning to these areas or to small diameter trees, instead it proposes a widespread and commercialised thinning program that threatens to become logging by a new name.

Key problems with the draft FMP's proposed thinning program:

1. It is not limited to mine-site rehabilitation and immature regrowth but includes regrowth forests over 50 years old and says that surrounding mature forests could be thinned as well.
2. It is not limited to ecological restoration. It opens the possibility of thinning following bushfire or 'treatment of other vulnerable areas' and lists possible 'co-benefits' of thinning including 'amenity', 'fuel distribution', 'water catchment protection' and 'recreation'. Critically, it fails to define 'conservation purpose' which it says is the primary objective.
3. It does not propose long-term trials to study the risks and benefits before locking in contracts and wide-spread operations.
4. It does not adequately consider the risks and dis-benefits of thinning including soil compaction, dieback spread, possible exacerbation of marri canker and the potential for reduction in stored carbon and increased flammability.
5. Rather than having scientists managing the on-ground application of the program, the draft FMP says that the Forest Products Commission would 'provide contract management, planning and operational support for ecological thinning for forest health.'
6. It is not limited to small diameter trees.
7. It does not require that only small machinery and/or hand-falling are used, nor does it set an upper limit for the intensity of thinning operations.
8. It plans to sell the wood produced, which would most likely be on a long-term contract basis locking in the supply and restricting the genuine application of any 'adaptive management'.
9. It proposes that up to 8,000 ha of forest could be thinned every year – this is approximately 1,500 ha more forest than is logged every year in the South West.
10. It does not establish any independent expert body of scientists to oversee and implement the program and associated operational trials.
11. It does not establish clear and transparent objectives and processes for the 'Disturbance Approval System'.

Recommendations:

1. Through the Conservation and Parks Commission, establish a panel of independent scientific experts to oversee program development – including site selection and thinning prescriptions, implementation, monitoring, adaptation and reporting.
2. Provide for a high level of community and independent expert engagement during the development of thinning program specifications.
3. Ensure the FMP sets out clear requirements for thinning to be limited to non-commercial programs and small diameter trees only, in sites such as mine-site rehabilitation and unnaturally dense immature regrowth and only where scientific evidence shows it is likely to improve the ecological health of the forests.
4. Limit the impacts of soil compaction and damage of retained trees by only using small machinery and hand-falling.



SECTION 3:

Fire

The draft FMP misses the opportunity to address problems with the current fire management program. In this section, we address specific statements made in the draft FMP and provide recommendations.

1. ***"Fire regimes that are sympathetic to the ecological requirements of forest ecosystems are essential for their effective functioning."*** (p72)

   Current fires regimes are not sympathetic to 'the ecological requirements of forest ecosystems.' It is well known that many species of flora and fauna need long unburnt habitat but little is left long unburnt, and such areas appear to be targeted for burning.

   DBCA manages 2,253,350ha vested in the Conservation and Parks Commission in the three South West forest regions and some other Crown and DBCA-owned land. Fires in up to 99% of this land are prescribed burns (PBs), not wildfires. With at least 45% of the land managed by DBCA required to have a 'fuel age' of less than 6 years, species that require long unburnt forest ecosystems 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.

2. ***"Fire can assist in the regeneration of native vegetation and promote the germination of seed, the maintenance or modification of habitats, and release and cycling of nutrients."*** (p72)

   Most species do not need fire to regenerate. Many are helped by smoke, but because smoke disperses widely, a causative fire is not always necessary.

   More nutrients may be lost through fire than are cycled. Fires burn soil organic matter, reduce the pool of nutrients and bacteria and fungi in the soil, lessen soil aeration and water infiltration/retention and the soil's ability to hold nutrients coming from ash.

3. ***"Fire regimes that are characterised by an appropriate range and diversity of fire intensities, seasonality, frequency (burn intervals) and spatial heterogeneity will promote ecosystem health and vitality, thereby providing greater resilience to climate change."*** (p72)

   On what basis are the "appropriate range and diversity" determined? It is an admirable position statement, but it is not implemented. The requirement to burn at least 200,000ha a year on the land it manages leaves DBCA little ability to adopt an appropriate range and diversity. Furthermore, it seems that for some burn boundaries, DBCA uses the old Forests Department's forest blocks, which contain a range of vegetation types but they may all get burnt at the same intensity, seasonality, frequency and spatial heterogeneity.

4. ***"Burning mainly occurs over autumn and spring."*** (p72)

   Historically, most prescribed burns (PBs) have been conducted in spring, the worst possible time for flowering plants and nesting birds.

6. ***"These burns are mostly low or moderate intensity, and often include many unburnt patches."***

   Many current PBs are high intensity and leave few or no unburnt patches. The extensive use of aerial ignition makes it difficult to practise mosaic burning.


Photo: Bart Lebbing

7. ***"Prescribed burn planning typically intends to avoid some parts of the planning area, such as wetlands, riparian vegetation, and rocky outcrops."*** (p72)

   Under current fire managements, wetlands, riparian vegetation, and rocky outcrops often get burnt, deliberately or accidentally.

8. ***"Each planned burn has management objectives, burn strategies and success criteria."*** (p 73)

   There is no independent monitoring of DBCA's PBs so there is no way of knowing if the objectives and criteria have been met or the burn strategies followed.

9. ***"The protection of life (people and communities) is the primary consideration in the planning and implementing of fire management activities."*** (p74)

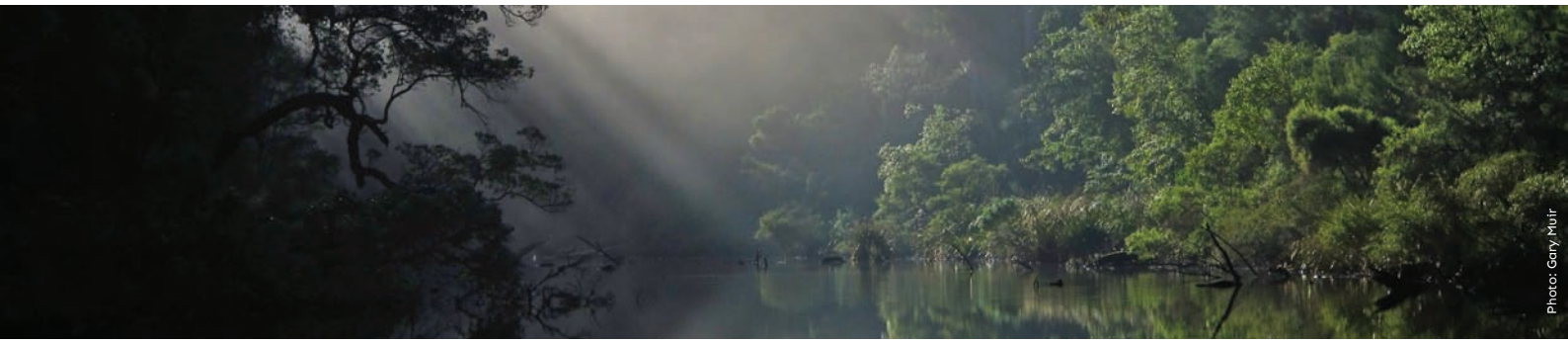
   The DBCA's primary objective in all programs and activities should be biodiversity conservation. It is also a tragic irony that while DBCA is prioritising protection of people and communities, the smoke from PBs is having major human health impacts, and in some cases increasing the risk of wildfire.

10. ***"Maintain capability in fire management, including prescribed fire, bushfire risk mitigation, detection and suppression."*** (p74)

    21st century methods of wildfire mitigation are available but not used. Early detection is possible to predict lightning, and drone fleets can confirm ignitions. Ground-based sensor networks can detect ignitions in areas of high ecological values. Cameras on fire towers can provide round-the clock fire detection. Satellites can inspect vast areas. There is technology that can measure and track flammability. GPS-guided vehicles can rapidly access and extinguish ignitions. Water gliders can be used when it is too dangerous to use aircraft or helicopters.

Recommendations:

1. Give biodiversity protection equal importance with protection of life and property in all fire management including rapid suppression, prescribed burning and fire exclusion areas.
2. Engage with Noongar Traditional Owners in fire management and the planning and conduct of wildfire mitigation.
3. Abandon the annual prescribed burn target and, instead, ensure that wildfire-mitigation measures are taken within 500 metres of buildings and infrastructure in need of protection.
4. End prescribed burning in areas remote from dwellings and infrastructure except for proven biodiversity conservation burns.
5. Abandon the requirement to have at least 45% of the land managed by DBCA with a fuel age of less than 6 years.
6. Transfer funds from expensive counterproductive prescribed burning to acquiring and using modern technology that provides rapid detection and at-source suppression of ignitions.
7. Engage with local Shires, DFES and the local community for mitigation and suppression activities, not only prescribed burning.
8. End the use of aerial ignition.
9. Require the Conservation and Parks Commission to conduct periodic assessments of the implementation of DBCA's prescribed burns and provide it with the resources to do so.
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. Engage with the peer reviewed science and scientists on long-unburnt forests, fire behaviour, flammability studies and the combined impacts of logging, thinning and burning on both biodiversity and the intensity and spread of wildfires


Photo: Gary Muir

SECTION 4:

Co-vesting and management with Noongar/Bibbulmun people

The draft FMP commits to entering into six Cooperative Management Agreements (CMAs), one for each of the six Indigenous Land Use Agreement Areas – Whadjuk, South West Boojarah, Gnaala Karla Booja, Wagyl Kaip and Southern Region, Ballardong and Yued.

"These agreements will acknowledge the continuing cultural, spiritual and social connections of the Noongar people to the region, and their unique traditional knowledge and expertise in the future management of the Estate. The establishment of these management partnerships, which cover the extent of the planning area, marks a new era of collaboration and provides opportunities to continue to develop the department's forest and fire management practices in the south-west region. The partnerships present exciting land management opportunities and will ensure the southwest forests are cared for using Noongar and Western methods." (p 53)

The plan says that Cooperative Management Committees (CMCs), made up of senior DBCA staff and six Noongar representatives, nominated by the respective Noongar Regional Corporation, will be established to implement the Agreements.

The next step is for Joint Management Agreements (JMAs) to be established. Specific areas of the South West region will be identified by the Cooperative Management Committees to be jointly managed by Joint Management Bodies, with at least one JMA per Land Use Agreement Area to be in place by February 2026.

The draft FMP specifies that the objective to protect and conserve the value of the land to the culture and heritage of Aboriginal prevails over an objective set out in section 56(1) of the CALM Act where they conflict or are inconsistent (p 53). It also states that once the new Aboriginal Cultural Heritage Act 2021 has commenced, it will replace the Aboriginal Heritage Act 1972 and *"offer improved protection for significant sites and Aboriginal cultural heritage"*, saying: *"This legislation allows for special heritage places, including cultural landscapes, to be named as Protected Areas."* (p 54)

The commitments regarding cooperative and joint management agreements and mechanisms for achieving the protection of cultural heritage and places, offer real tangible steps towards Noongar / Bibbulmun co-management. However, the draft FMP has failed to set out a process for co-vesting the land with Noongar / Bibbulmun people, which is provided for under current legislation and needs to be addressed before the FMP is finalised.

Recommendations:

1. Set out a clear, timebound process, led by Noongar / Bibbulmun people to provide for co-vesting, as well as co-management in the final FMP.
2. Fully resource programs to engage Noongar / Bibbulmun people at all levels, including with funds for ongoing on-ground and coordination work across Country.
3. Change the wording of the 'Strategic goal: To value and protect Noongar cultural heritage and support Noongar Traditional Owner involvement' to read: *'To value and protect Noongar involvement and cultural heritage and include Noongar Traditional Owners in management decisions.'*



Photo: Donna Chapman

SECTION 5:

Social and economic opportunities

The strategic goal 'to deliver social and economic benefits through the provision of goods and services' for this section, must be amended to prioritise the protection and maintenance of conservation and biodiversity values.

5.6.1 Nature based tourism and recreation (pp 85)

The overall aims and strategies of the draft FMP are appropriate, particularly the recognition that education and recreational time spent in the forest foster stewardship, and that a balance must be sought 'between conservation and protection of other values and uses.'

However, the balance between recreation/tourism and conservation must prioritise conservation, particularly in National Parks and other 'A' class conservation areas. This is discussed within Management activity 2 in Table 24:

"Assess recreation and tourism proposals to ensure that approved activities enhance, or do not negatively impact on, the area's key values, visitor experiences and sense of place." (p86)

Recommendations:

1. Modify the strategic goal to add protection of biodiversity and conservation values so that it reads: 'to deliver social and economic benefits through the provision of goods and services *while maintaining or enhancing biodiversity and conservation values*.'
2. Modify Management Activity 2 to include proposals, so that it reads: 'Assess recreation and tourism *proposals and activities* to ensure that they enhance...'

   This would enforce the requirement to monitor and assess activities on an ongoing basis and enable action to be taken where an activity or commercial operation is having a negative impact on conservation values.
3. Modify Management Objective 1 to prioritise conservation, so that it reads: 'Provide for a range of recreation and nature-based tourism opportunities, through visitor planning *that ensures impacts on biodiversity, conservation and heritage values are minimised*, while delivering economic benefits to meet public demand.'



SECTION 6:

Carbon storage and climate

The draft FMP represents a major breakthrough in terms of recognising the value of protected forests in mitigating and building local resilience to climate change, saying:

"Estimates compiled for the FMP 2014-2023 suggest the combined above- and below-ground forest carbon stock in 2012 was around 600 million tonnes CO_2-equivalents (Conservation Commission of Western Australia 2013). This was around seven times Western Australia's total annual greenhouse gas emissions in 2017 of 88 million tonnes CO_2-equivalents." (EPA 2020) (p30)

"Mitigation measures include enhanced carbon stores through an expanded reserve system (Foundation 2), protecting carbon-dense forest stores and promoting rapid recovery from disturbance." (p63)

"Carbon storage is an important element of the plan given the role of forests in storing carbon. In the short-term, carbon stored in trees in areas that would otherwise have been harvested will persist, with additional growth contributing to the amount of carbon stored in the forest pool." (p63)

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 CO_2 concentrations under historical fire regimes' 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 200,000 ha of forest per year intentionally doesn't increase carbon in the atmosphere but that large-scale bushfires do. Further, the clearing of 1,000 ha 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.

The management activity to, 'Prioritise the protection of carbon stored within carbon-dense forest ecosystems by managing the risk of landscape-scale high intensity bushfires through prescribed burning and fire suppression' is counterproductive to the strategic goal to maintain or improve forest health and climate resilience.

Thinning is addressed in section 2 of this assessment so we don't go into a great amount of detail here, but it's important to note that while there may be climate change resilience benefits to some areas, this is entirely dependent on the nature of the program that is developed. Thinning can have negative consequences for forest health, biodiversity and climate resilience where it is not appropriate for the site or where the program specifications are inappropriate.

Recommendations:

1. Explicitly acknowledge the role of biodiversity in ecosystems for improving climate resilience.
2. Give biodiversity conservation equal importance to carbon storage in the management objectives and activities.
3. Measure and provide data on the carbon emissions, forest carbon stock losses and reduction in sequestration potential that result from prescribed burning (including escapes and burns that run hot) each year.



Recommendations continued:

4. Create a network of National Parks and other Class A protected areas across the under-represented and vulnerable Northern Jarrah Forests.
5. Make restoration of cleared land a priority, particularly where it can link habitat for species movement and resilience.
6. Provide for a high level of community and independent expert engagement in the development of climate mitigation and resilience programs.
7. See recommendations on fire management and thinning in sections 2 and 3.

SECTION 7:

Unauthorised activities

Illegal firewood collection, including clearing vegetation and cutting down trees, is a major problem in the forests and needs to be taken far more seriously by DBCA. The draft FMP acknowledges the issues with this and other 'unauthorised activities' (p84) but the response is inadequate.

Recommendations:

1. Significantly increase resourcing of local offices to investigate and take action to prevent illegal firewood collection and other unauthorised activities which negatively impact forests and wildlife.

Conclusion

We hope that you find this assessment helpful, and we encourage you to have a look at the draft FMP and the submission writing points on the DBCA website before you write your own submission.

There are some sections that we haven't directly addressed in their own right here, including weeds, disease and introduced predators. We also haven't focused on those areas that aren't directly managed by DBCA – including mining authorisations and plantation clearing because there is less opportunity for the FMP to directly deal with these matters other than through the approaches we've recommended in various sections.

Don't hesitate to get in touch via forests@wafa.org.au and remember to get your submissions in by 18 December.

Yours for the forests,

The WAFA team.

For more information:

www.wafa.org.au

Draft FMP, submission writing points and supplementary info on DBCA website https://bit.ly/DraftFMP-Oct2022

Contact: forests@wafa.org.au