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Conservation and Parks Commission
Department of Biodiversity Conservation and Attractions

Draft Forest Management Plan (FMP) 2024-33

The Urban Bushland Council WA Inc. (UBC) makes the following comments on the draft FMP 2024-33. The opportunity to comment is much appreciated. As requested, 'agree' and 'disagree' comments are made on just some sections. Recommended additions or changes are shown.

Pages 36 – 50: 4 Part B – Pressures on our south west forests

Agree: The nine pressures are well described in 4.1 – 4.9 on pages 36 – 50.

Our network of volunteer friends groups are well aware of these 'pressures' and threats, and they conduct on-ground management in conjunction with the relevant land managers to help protect the rich biodiversity of our public conservation lands.

Pages 51- 95 5 Part C – Managing our south west forests

Pages 53-56: 5.3 Foundation 1: Noongar cultural heritage and management partnerships.

The Strategic goal is supported with a change in the wording to '**include**' rather than '**support**' Noongar Traditional Owners in both management decisions **and actions**.

A positive example of this type of engagement: Notably the aboriginal practice of only doing small cool burns in winter to reduce fire risk immediately around the Margaret River town site area is being carried out with local people and local elders.

But the prescribed burning practices by DBCA are not consistent with aboriginal advice and practices. This issue was presented at the Fire and Biodiversity Forum that was presented at Margaret River on 4th June 2021.

It is recommended that the FMP add in a commitment to fully fund and resource programs to engage Noongar/Bibbulman people at all levels for on-ground work and coordination across country.

Pages 53 – 56: **Agree: 5.3.1 and 5.3.2** are supported.

Pages 56 – 63: 5.4 Foundation 2: Biodiversity conservation

Pages 56 - 59: 5.4.1 Maintaining and expanding the conservation reserve system

Agree: The commitment '*maintaining and expanding the CAR reserve system through implementing the 320,360 hectares of commitments identified in previous FMPs is a priority*' is strongly supported and should be fully carried out within two years - *ie* in 2024 and 2025. It is unfinished business from earlier plans which deserves immediate action.

Agree: All the new FCA's proposed to be added to the CAR reserve system are supported.

Disagree with continued mining in forest areas: Change to FMP needed: Additional Forest

Conservation Areas (FCA) needed: It is recommended that a network of new National Parks and ‘A’ class Nature Reserves be added in the Northern Jarrah Forests as a top priority. This would remove the continuing extensive forest destruction from bauxite mining, and also from other mining projects. This is an important biodiversity conservation initiative.

In the FMP area, ~1000 ha per year is subject to mining and petroleum operations, much of which is for bauxite mining in the Jarrah Forests. Sand and limestone mining should be restricted to suitable lands that are already cleared.

Also it is strongly recommended that no further timber logging be permitted in native forest areas, including no forest thinning.

Disagree with forest thinning: The FMP proposes that up to 8000 ha of forest could be thinned every year in the south west. It is strongly recommended that this be changed as it is a way of allowing some continued logging and ‘timber salvaging’ and also with soil disturbance by vehicles, increases the likely spread of weeds and diseases such as Dieback. It is disturbing that at least 242,100 ha is infested with Dieback and that >40% of southwest flora species are considered vulnerable to Dieback in the FMP area. Forests are naturally self-thinning and this should be allowed to happen.

Pages 59- 60: **5.4.2 Conserving biodiversity**

Agree: This section is strongly supported.

Notably very much increased scientific staff (botanists, biologists, ecologists and data management experts) and on-ground management staff and resources in DBCA are needed to do all the much needed work. Management and control of threatening processes needs much more focus and funding.

Pages 61- 63: **5.4.3 Managing permitted disturbance activities**

Disagree: On page 62, there is a ‘**Disturbance Approval System**’ (DAS) to permit disturbance activities, development and infrastructure projects on CALM Act lands.

Management activities include: ‘*Assess relevant proposed disturbance activity on CALM Act lands using DAS to avoid or mitigate impacts on biodiversity and other values and assets. Seek to minimise the area of permanent vegetation loss to development*’. While these activities purport to be biodiversity protection actions, **they are allowing destruction of biodiversity and thus are not properly conserving biodiversity**. All such activities should be avoided.

Thus we disagree with this DAS process to approve these developments on lands vested in the Conservation and Parks Commission. These conservation lands are for conservation of biodiversity. This approval process is inconsistent with and indeed contrary to the Strategic goal to conserve biodiversity. Mining and major infrastructure should not be permitted in these conservation lands.

Agree: On page 63, the Management target of ‘*an increase of at least 400,000 hectares in the area of lands that contribute to a CAR reserve system*’ is supported.

Also the target ‘*Status and condition of key biodiversity values is maintained or improved*’ is supported.

Pages 63 – 84: **5.5 Foundation3: Forest health and climate resilience**

Agree with Strategic goal.

Pages 63 – 64: **5.5.1 Climate mitigation: carbon storage**

Agree: Wording on pages 63 and 64 is good, except for the ‘proactive reliance on prescribed burning’ and comments on this are in the next section:

Disagree: Page 64: In the Management activities in Table 9, prioritising prescribed burning is not supported.

Fire suppression is supported and it is recommended that the capacity for fast detection of fires and fast

suppression is greatly increased. Investment in modern technology and cameras that detect fire at ignition, and then that immediately initiates fast attack, followed by greatly increased capacity for fast attack by air water bombers as well as by on-ground fire fighters, is needed to be added.

The other Management activities in Table 9 are supported.

Pages 65 – 71: **5.5.2 Climate adaptation: active forest management and ecological thinning**

Disagree: The general approach of ecological thinning across the various ecosystems described is not supported. It provides a continued rationale to allow some forest logging in native forests.

Native ecosystems (forests, woodlands etc) are naturally self-thinning. This natural process should be allowed to occur. In contrast, the proposed thinning will increase soil disturbance from vehicles and machinery and this will facilitate increased weed invasion, Dieback spread, and increased feral animal invasion and degradation by feral pigs, foxes, feral cats etc.

A likely goal to require an overall annual thinning program of up to 8000 hectares is not supported. This is a large area that would be disturbed, and is thus contrary to conservation. This is ~1500 ha more forest than is logged every year in the south west.

The statement: *‘The sale of forest products that result from ecological thinning may enable costs of thinning to be offset, enabling a larger area to be treated and hence improve patch and landscape resilience’* does not justify all the disturbance from thinning.

On page 70, The so-called ‘potential co-benefits’ are not supported.

Continuing removal of forest products is not supported.

Page 72: **5.5.3 Climate science**

Agree: This section is strongly supported.

Pages 72 – 74: **5.5.4 Fire management**

Disagree: The current practice of prescribed burning is resulting in destruction of biodiversity rather than its protection. Vertebrate fauna such as Numbats, Western Ringtail Possums (critically endangered), and Quokkas and Black Cockatoos are being burnt and killed or starved and put at risk. This animal welfare issue is reason alone for review of current practices. Millions of invertebrates are being killed also. In addition, peat swamps, granite outcrops and wetlands which must never be burnt, are being destroyed by ‘escaped burns.’ This destruction is unacceptable.

Also, the smoke pollution from the current practice of burning up to 200,000 ha of forests is having significant human health impacts resulting in hospital admissions and some deaths, - more than from wildfires. This is contrary to the goal of protecting human life.

Many senior scientists, such as Em. Prof. Don Bradshaw, and conservation organisations such as The Leeuwin Group, Birdlife WA, the Denmark Environment Group have called for the target of prescribe burning 200,000 ha/year to be abandoned.

Burning on the Swan Coastal Plain results in increased grassy weed invasion, which then increases fire risk.

Recommended changes:

1. Abandon the current annual 200,000 ha prescribed burn target.
2. Conduct a full and independent scientific review of current prescribed burning practices.
3. Abandon all prescribed burns on the Swan Coastal Plain, especially in the Perth – Peel region.
4. Restrict fire fuel load reduction to areas close to human settlements, and patch burn only ground fuel in winter according to indigenous practices. Never burn the canopy.
4. Abandon the practice of air ignitions from aircraft. Aboriginal people never burned the canopy and

- they strongly recommend against it. It kills native fauna and destroys habitat.
5. Never burn in spring or early summer as young birds may still be in nests, and flora seeds not all set.
 6. Engage with and involve indigenous elders in minimising fire risk.
 7. Recognise that fire is a 'Key Threatening Process' to biodiversity under the *EPBC Act*.
 8. Invest in modern technologies that immediately detect ignitions, and that engage immediate fast attack to extinguish fires before they spread. Also greatly increase capacity for fast attack by on-ground fire fighting by local brigades and DFES and for air water bombers.

Page 75: **5.5.5 Weeds**

Agree: This section is supported. Minimising ground disturbance as described is important. This would be better achieved by not allowing so called ecological thinning programs. See comments above. Also because weeds are a major threat to ongoing biodiversity protection, it is recommended that much more DBCA resources and on-ground staff be allocated to control weeds.

Pages 76 – 77: **5.5.6 Pest animals**

Agree: This section is clear and strongly supported.
Increased funding for DBCA to carry out all this important work is recommended.

Pages 78 -79: **5.5.7 Diseases**

Agree: Supported. Given the increasing threats, increased funding and resources for DBCA to carry out this work is recommended.

Pages 82 – 83: **5.5.9 Regeneration and rehabilitation**

Agree: Supported. Given the large areas needing this restoration, increased funding and resources for DBCA to carry out all this work is recommended.

Page 84: **5.5.10 Unauthorised activities**

Agree: This section is supported.
In addition, it is strongly recommended that an arson watch and arson control program - in conjunction with DFES and WA Police arson squad, - be added and introduced.
It was reported in the West Australian Thursday December 8, 2022 that *'At least five deliberate or suspicious fires were reported to police every day during the last bushfire season in WA. More than 876 reports were investigated by the Strike Force Vulcan team between November 2021 and April this year.'*

Pages 85 – 95: **5.6 Foundation 4: Social and economic benefits and opportunities**

Pages 85 – 86: **5.6.1 Nature-based tourism and recreation**

Agree: Agree only in so far as nature-based tourism and recreation does not negatively impact on the environment.

Page 87: **5.6.2 Other Australian heritage**

Agree: Supported.

Page 89: **Public firewood areas**

Disagree: There should not be any areas in native forests or woodlands as listed where falling timber can be taken, as fallen and dead timber provides important habitat for invertebrates and vertebrates. The only exception could be where timber has been harvested from plantations.

Page 89: **Basic Raw Materials (BRM)**

Disagree: There should not be any BRM mined from native forests and woodlands and areas of native vegetation.

Sand, limestone, clay, rock and gravel should only be sourced from suitable lands that are already cleared.

Pages 93-97: **5.6.5 Stakeholder and community engagement**

Agree: This section is generally supported. More educational events such as guided walks and processes for community involvement in learning about our unique flora, fauna and ecosystems should be added. Being in nature (passively) has important human health benefits.

For further clarification of any of the above, please contact me at.

Yours faithfully

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