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22nd September 2023

Dear Appeals Convenor

**UBC Appeal against some sections of EPA Report 1745, August 2023 (under s. 44 of the EP Act) on Assessment number: 2361 of the Forest Management Plan (FMP) 2024 – 2033.
Proponent: Conservation and Parks Commission (under CALM Act 1984)**

Grounds of Appeal

1. Ecological thinning

On page 31 of the EPA Report: 3. *Holistic assessment*, it says the FMP ‘...achieves the following environmental outcomes’, one of which is: ‘maintains and improves the biological diversity and ecological integrity of flora and vegetation and terrestrial fauna’ .. of forest ecosystems so that environmental values are protected’.

But the EPA says the objective of ecological thinning is to promote forest health and resilience and is likely to result in positive outcomes for factors ‘if managed appropriately and in accordance with recommended conditions’. We do not agree with this, rather the opposite is the case. We appeal against allowing this so-called ‘appropriate ecological thinning’. There should not be any ecological thinning permitted.

The definition of ecological thinning is on page 47 and says that it provides for the ‘selective **removal of individual trees**’. This is not just cutting down individual trees and leaving them on site. Instead the FMP proposes that up to 8,000 ha of forest could be thinned each year and that the wood produced **plans to be sold and it is not limited to small diameter trees**. This form of thinning therefore allows for a form of forest logging to continue which is inconsistent with and indeed contrary to the Government’s end of forest logging from 2024.

This thinning would also result in a very large area of disturbance of soil, flora and vegetation from big machinery and also risks further spread of dieback and other forest diseases, as well as weeds. **This will not maintain and improve the ecological integrity** described above and will therefore not meet the Approval Conditions B1, B1-1, B1-2 (as on pages 39-40).

It is recommended that a revised recommendation by the EPA be that **no ecological thinning is permitted**. This would then require that the sections on reporting of proposed and actual thinning be deleted from the FMP: delete B2-1 (as on page 39); delete B2-2, B3: B3-1, B3-2 (as on page 40).

On these grounds alone, this ecological thinning is totally unacceptable, and the Minister should require that this form of logging under the guise of approved thinning be removed from the FMP. There should be no thinning of native forests vested in the Conservation and Parks Commission lands. It is well known that forests self-thin naturally.

Thus in the **Recommended Conditions on page 38: A1 Limitations and Extent of Proposal: we appeal against A1-1** which allows ecological thinning of up to 8,000 ha/year as it is inconsistent with maintaining the health and ecological integrity from disturbance and spread of dieback and other diseases within the large area of up to 8000 ha each year. We appeal for the Minister to require that this provision for ecological thinning be removed from the FMP.

2. Prescribed Burning

On page 38: Recommended Conditions: **A1 Limitations and Extent of Proposal: we appeal against the**

EPA's support for prescribe burning up to 200,000 ha/year. This target should be abandoned. Indeed this burning target is inconsistent with the **EPA's recommendations on page 34-35: 5. Other Advice: 5.2** for Independent scientific review of Prescribed Burns with details of the review recommended on pages 34.

It is also inconsistent with **3 Holistic Assessment on page 31** for protection of flora and especially of fauna in part B – Environmental Outcomes, Prescriptions and Objectives especially in B1-1 and B1-2. In the current practice of burning up to 200,000 ha, thousands of fauna are killed, including our iconic endangered species such as Numbats, and Ring-tail Possums.

On the Swan Coastal Plain (SCP) and especially in the Perth Metropolitan Region, there should be no prescribed burns permitted as it increases grassy weed invasion which then increases fire risk and worsens ecological integrity by killing fauna and reducing vegetation condition, and also is a human health risk from the smoke. The FMP should require no prescribed burns permitted on the SCP.

On page 65: Prescribed fire: The aim for 45% of forested areas managed by DBCA having a fuel age of less than 6 years equates to 'treating' (*ie.* prescribe burning) 8% of forest managed by DBCA annually (~ 200,000 ha). Fire every 6 years would result in massive deaths of small fauna – reptiles, invertebrates as well as mammals and birds suffering burns and loss of forage habitat. This is destruction, not protection. Long unburnt forests have the lowest fuel loads. Other unacceptable health impacts are described in number 4 below. We appeal against this aim and it should be abandoned.

Burning also produces significant greenhouse gas emissions and this factor should be included. The prescribe burning of 200,000 ha produces unacceptably high emissions. Ecological thinning also contributes to emissions.

The EPA advice should require that the FMP restricts fire fuel load reduction to areas close to human settlements, and to patch burn only ground fuel in winter according to indigenous practices, and also to never burn the canopy. Also the practice of air ignitions from aircraft should not be permitted. Aboriginal people never burned the canopy and they strongly recommend against it. It kills native fauna and destroys habitat. Also the FMP should advise to never burn in spring or early summer as young birds may still be in nests, and flora seeds will not be all set. The FMP should include the requirement to engage with and involve indigenous elders in minimising fire risk. Notably this is being done around the Margaret River townsite.

Please also refer to the UBC's attached notes from the Fire and Air Forum held on 5th May 2023 at the University Club of WA. It includes advice and evidence presented by many scientists and medical experts concerning these matters.

3. Resourcing

On page 36: under **5 Other Advice: 5.4: 5.4 Communication and engagement:**

While it is strongly agreed with the EPA recommendation that increased resourcing for implementation of the FMP is needed, the Minister should not just 'consider' whether resourcing should be enhanced, but instead 'allocate' greatly increased resourcing to meet the EPA's recommended conditions. This wording should be changed to require this increased allocation of resources (funding).

The DBCA is already seriously under-resourced to effectively manage the lands under its control. Now with increasing threats especially from climate change and extreme weather events, invasive species, and fire, much more resources are needed for the next 10 years of the FMP to employ many more scientists and on-ground managers to provide the rehabilitation and restoration the EPA recommends on pages 35 – 36 under **Other Advice 5.3** - in order to properly protect and manage our unique south west biodiversity hotspot.

Wildfire prevention: More resources are especially needed to fund modern technologies for fast detection and for fast attack in the event of unplanned fire ignitions. Fire is now recognised as a Key Threatening Process (KTP) under the EPBC Act. Focus on this is needed in the FMP.

Invasive species: Greatly increased funding for effective control of invasive fauna species such as Corellas, Rainbow Lorikeets, cats, foxes, pigs and rabbits is much needed and should be specified in the FMP. Greatly increased funding is also needed for effective weed control.

4. Air quality

The environmental factor **Air** on pages 58-59 - requires revision.

The EPA did not consider Air quality to be a key environmental factor. While the EPA has recommended an independent scientific review into prescribed burning at section 5.2 of their Report, it should also identify potential further mitigation and management of emissions from prescribed burns and associated impacts to air quality.

Air quality is certainly a significant factor and smoke emissions cause significant human health impacts as well as impacts to wildlife especially fauna. Indeed there have been significant unacceptable impacts on Perth residents from smoke inhalation from prescribed burns in the south west.

Thus air quality should be included.

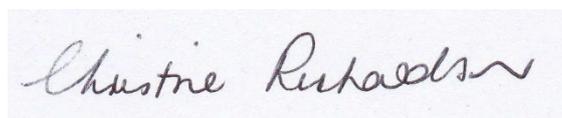
5. Protection of the Northern Jarrah Forests

The WA State's Native Vegetation Policy is to increase the area of native vegetation. WA's south west biodiversity hotspot is for conservation priority because it is under threat and the FMP should therefore require that there is no more clearing of the SW forest region. This is also consistent with the COP 15 UN Biodiversity Agreement which calls for at least 30% retention of high conservation value regions and for another 30% restoration. Thus the FMP should especially include protection of the Northern Jarrah Forests with no more deforestation.

The EPA should recommend that there be a change to bauxite mining under State Agreement Acts. For example strip mining should no longer be permitted in the Northern Jarrah Forest. The EPA should recommend ending deforestation and all types of mining in the Jarrah and other Forests, and the Minister for Environment should make this happen. This is part of protecting forest ecosystems.

Representatives of the Urban Bushland Council WA Inc. request the opportunity to meet in person with you concerning this appeal. Please contact us at ubc@bushlandperth.org.au and via our Secretary Margaret Owen at goffmarg@bigpond.net.au or by her direct phone 0409 927 810 to organise a suitable meeting date.

Yours faithfully



Christine Richardson
Chairperson, Urban Bushland Council WA Inc.
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Attachment: Fire and Air Forum 5 May 2023

FIRE & AIR FORUM – Biodiversity, Environmental Sustainability and Human Health
Held Friday 5th May 2023 at University Club of Western Australia

Convenor: Dr Carole Peters Contact: fabforum21@gmail.com

Hosts: WA Forest Alliance (Wafa) and Royal Society of Western Australia (RSWA)

Sponsors: Wilderness Society (TWS), Conservation Council of WA (CCWA), Busselton - Dunsborough Environment Centre (BDEC), South-West Forests Defence Foundation (SFDF), Margaret River Regional Environment Centre (MRREC), Denmark Environment Centre (DEC), Fire & Biodiversity WA (FaBWA), South Coast Environment Group (SCEG), Urban Bushland Council (UBC), Birdlife WA (BWA), Doctors for the Environment Australia WA (DEA WA) and Australian Conservation Foundation Perth Community Group (ACF PCG).

The Urban Bushland Council (UBC) is one of the twelve community organisations that were sponsors of the Forum hosted by Wafa and RSWA. Below are some key points made at the Forum and noted by Mary Gray. Please note this is not a summary of all the presentations.

Following the highly successful **Fire & Biodiversity Forum**, held in June 2021 at the Margaret River HEART, expert speakers at this **Fire & Air Forum** expanded the conversation on how best to protect our natural landscapes and our people, for a sustainable and healthy future.

Community concern regarding the destructive impacts of broad scale prescribed burning (PB) in our South West Biodiversity Hotspot is high. Pervasive smoke pollution heightens concern about the frequency, scale and intensity of planned burns, risks to public health and safety, risks to biodiversity, and the escalating risks of climate change.

Notably, the prescribed burning program in WA is the largest for any of the world's biodiversity hotspots. The target is for the Department of Biodiversity, Conservation and Attractions (DBCA) to prescribe burn 200,000 ha per year, not counting escapes and private landholder burning.

Prescribed burning close to settlements should be informed by both western science and traditional knowledge. First Nations Elder Lynette Knapp advised there should be small patch burning only, no hot fires, no big fires, and *'if you can't manage it, don't do it!'*

Prof. David Lindenmayer AO (Fenner School of Environment & Society, Australian National University)

'Fire and the future of forests':

The size and prevalence of fire is increasing in some places.

There were 3 mega-fires recently in Australia.

There was an increase of up to four fires in NE Victoria compared with one in the past 100-150 years. There were extensive repeat fires in the period 2001-2020 compared with 1981-2000. This is a substantial change.

Australia is doing badly compared with the rest of the world.

Carbon storage in forests is declining significantly, with a big increase in wood production from forests in the last 10-20 years.

Fire is always more severe in forests which have been logged.

In 7-10 year old regrowth, there is an increase in canopy fire.

There is much less, ie little fire in old unlogged forest.

In logged forest there is a change in forest structure with more debris and drier soil.

Thus, widespread logging results in young forest and increased fire risk. Some forests burn 3-4 times in 25 years. With these altered and increased fire regimes, there is a low chance of forests growing to saw-log production. Thus fire is competing with forestry resources and fire is winning. Multiple fires in rapid succession are a risk to collapse of ecosystems.
Fire intervals should be at least 75–100 years.

Actions needed:

- No thinning of forests and no ‘salvage logging’
- Grow more old forest and reduce logging
- Focus on fire prevention and risk reduction
- Lightning forecasting and detection
- **Rapid** ignition detection
- **Suppress quickly.**

ABC Landline (21.2.21) and ABC NEWS (11.12.22) documentary featuring Dr Joanna Young, Dr David Edmonds & Prof Stephen Hopper: ‘Striking the balance between hazard reduction burns and biodiversity’: (see vimeo.com/channels/fabforum)

In 2015, in the biodiversity hotspot of the Walpole Wilderness, a peat swamp was destroyed by a prescribed burn. More peat swamps were destroyed by fire in 2019, 2020, and 2022. Destruction of peat swamps was described by Dr Joanna Young as “the Juukan Gorge moment” for DBCA to listen to community concern and move on from the ‘fear factor’ and polarised debate. Peat swamps must never be burnt, as fire completely destroys them.

E/Prof. Don Bradshaw (University of WA & Dep. Convenor, ‘The Leeuwin Group’) **‘Fire and fauna’:**

There had never been extensive burning prior to European settlement of Australia. Lightning resulted in fire frequency of 81 years pre-European settlement.

Tammars and Wallabies east of Manjimup run ahead of fire, and then go back to, and stay in, their home range. They are dependent on fire being not too frequent.

Post fire, 33 Woylies were killed by foxes, shock syndrome, wedge-tailed eagles. This was disastrous for Tammars and Wallabies.

Honey Possums depend entirely on flowers for food and thus are highly vulnerable to fire.

In November 1993, a fire lit by a farmer which was then back-burned, killed half the Honey Possum population.

In 1996 there was a repeat of the above situation, despite Don Bradshaw’s advice which was ignored. Burning every 6 years will likely lead to extinction of Honey Possums.

Before the fire, there were 8.73 Honey Possums per ha.

Quokkas in Northern forest prefer *Lepidosperma* which grows in long unburnt forest. It takes 30-40 years to grow to the preferred ‘old’ state.

A 6-8 year interval for prescribed burns is not preferred by Quokkas.

The critically endangered Western Ringtail Possum: A prescribed burn killed 71%.

In a ‘cool burn’, Grass Trees burning under tree hollows containing Possums resulted in a temperature of >500 degrees C in the hollows, and subsequent death of Possums.

Numbats: In 2021 a prescribed burn became a hot intense burn which destroyed ~5000 habitat trees. There was a lack of understanding by DBCA of breeding sites and their vulnerability.

Birds: With fire, wrens decline in numbers and disappear.

Carnaby’s breeding hollows which are ~220 years old must be protected from fire.

Forest Red-tailed Black Cockatoos require protection from fire in their spring and autumn breeding seasons.

E/Prof. Don Bradshaw's summary of features of fire:

1. The current fire regime is highly detrimental.
 2. Must protect long unburnt areas.
 3. Prescribed burning (PB) does not reduce wildfire risk. On the Swan Coastal Plain, PB increases wildfire risk.
 4. Increasing fire frequency produces a more flammable landscape.
 5. 80% of SW fires are PB. 80% of wildfires are caused by humans. So, of all fires in SW of WA, 96% are caused by humans.
 6. Study shows that there is no correlation on wildfires by PB. There is no scientific basis for 200,000 ha to be prescribe burned, and it should be abandoned. This PB size is huge compared with wildfires.
 7. Need to change to fast detection of fire, and fast attack to suppress fire.
 8. Burning 200,000 ha is the largest ecological impact after climate change. This applies to all habitats and ecosystems.
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Dr Tristan Campbell (Curtin University), **E/Prof. Don Bradshaw** (University of WA) & **Prof Kingsley Dixon** (Curtin University)

'Prescribed burning and wildfire':

Fire is a 'Key Threatening Process' (KTP) recognised under the *Environment Protection and Biodiversity Conservation (EPBC) Act*.

Fire has the second largest impact on Matters of National Environmental Significance (MNES).

Unintended impacts of PB include destruction of peat ecosystems.

Wandoo Woodland case study: PB turned into a very hot burn with loss of mature and immature trees, large tree logs burnt out, and reduced understorey diversity.

PB is leading to species extinctions, and ecosystems undergoing collapse.

Dr Carolyn Orr, Neurologist (Member, Doctors for the Environment Australia)

'If prescribed burning was a medicine, would doctors prescribe it?':

Prescribed burning (PB) causes harm to human health, as well as irreversible harm to our environment.

Humans should not be subjected to smoke. Smoke PM 2.5 is toxic resulting in serious impacts:

1. Increased cancer, heart attacks, strokes, asthma, and with increased hospitalisations.
 2. Deaths of animals.
 3. Contribution to climate change with carbon release in burns, loss of carbon sequestration, nature's store of carbon lost.
 4. Need old trees in mature intact forests for conservation.
 5. PB cost is \$50+ million per annum in WA.
 6. Spring PB is the worst time possible time for nesting birds, flowering plants and loss of pollinators.
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Dr Adeleh Shirangi (Curtin University & Murdoch University)

'Health impact of landscape fires in Perth WA':

Smoke pollutants include carbon monoxide (CO), Ozone, PM 2.5 particles, which can enter the bloodstream leading to respiratory hospital admissions, cardiovascular morbidity and mortality.

Our National Environment Protection (Ambient Air Quality) Measure (NEPM) standard for PM 2.5 particles is 25/mg/m³ which is double the World Health Organisation (WHO) standard.

Actions needed:

1. Reduce exposure to emissions.
 2. Community health education programs to delay and avoid smoke effects etc.
 3. Wear N95 masks outdoors if smoke present.
 4. Automated monitoring and mapping of smoke.
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Dr Fabienne Reisen (Climate Science Centre CSIRO)

‘Smoke exposure on & off the fire ground’:

Dr Reisen gave an analysis of the components of smoke and impacts:

Smoke includes lots of gases as well as particles. Gases include Hg, benzene, NO_x, CH₄, CO, O₃ and more. Exposure can be acute, chronic, cumulative.

Multiple toxins result in synergistic health effects on the eye, nose, throat, brain, and can be cancer causing and more.

Tom Chvojka (Landowner Quinninup WA)

‘Conserving native forest on private land’:

Huge areas were burnt in one PB. Lots of invertebrates and insects were killed.

In Manjimup, big old trees – giants – burnt, and then died in 5-10 years after the PB.

There is no need for PB as long unburnt forest has a very low ground fuel load.

Tony Pedro (Farmer, Firefighter & Conservationist, Denmark WA)

‘Funding for fast detection and rapid suppression’:

‘Don’t Torch the Tingles’ (documentary available on vimeo.com/channels/fabforum)

The Walpole–Nornalup National Park is long unburnt ‘pre-European’ forest.

The Tingle forest has low fuel load and must NOT be burned.

There must be no PB in all the long unburnt forest.

Instead, there must be funding for fast detection, fast attack capacity and rapid suppression of fire.

A/Prof. Marta Yebra (Director ANU-Optus Bushfire Research Centre of Excellence)

‘An integrated approach to protecting Australia from catastrophic bushfires’:

Technology has been developed for drones to detect small fires in large areas. Various techniques are available for early detection using satellites, drones, cameras on towers, and on-ground sensors and water gliders. No single technology offers a complete solution.

‘We must accelerate the development of modern technologies to detect and suppress ignitions efficiently.’

Adjunct A/Prof Phil Zylstra (Curtin University)

‘Making a path through the firestorm’:

In Karri forest there is an ‘almost complete absence of fire scars pre 1850’ (Rayner 1992).

A/A Prof Zylstra explained there is no relation between ‘fuel load’ and rate of spread of fire. It’s not the weight of leaves on the ground, it’s the density and the height of the understorey that drives fire, creating a ladder to the canopy.

Old forests should NOT be burned.

From trials and research papers there is a confused story. A few years after PB there is an increased low shrub fuel load resulting in more fire risk for up to 20 years, then it drops over time as the forest self-thins. After 50 years, there is much less understorey, less cover and less fire risk.

Tingle forests: Traditionally aboriginal people did not burn Tingle forest. They should not be burned.

FIRE & AIR FORUM Message from the Convenor, Resources, References and Media links:

<https://wafa.org.au/fire-and-air-forum/>

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