



Forest Management Plan 2024-2033

[Forest Management Plan 2024-2033 - Environmental Protection Authority - Citizen Space \(epa.wa.gov.au\)](#)

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5. Preferred option for decision by the EPA

▶ [More Information](#)

(Required)

- Do not assess
- Assess - Referral information
- Assess - Environmental review - no public review
- Assess - Public environmental review

6. What are the reasons for your preferred option for decision of the EPA?

Note: Please give succinct reasons for your recommendation. Your comments should not exceed 500 words (about one A4 page).

(1) EPA ENVIRONMENTAL PRINCIPLES

Not requiring a PER is at variance with the 'precautionary', 'intergenerational equity' and 'conservation of biological diversity and ecological integrity' principles.

(2) EPA ENVIRONMENTAL FACTORS & OBJECTIVES

B1-F&V

Applying the EPA guidance statement No 51, highlights that that vegetation of the FMP is highly significant.

Thinning has a similar impact to clearing, including soil disturbance by vehicles, 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.

B3-SF

What is the impact of removal of natural vegetation combined with soil, geology and hydrological disturbances on subterranean fauna?

B4-TEQ

What is the impact of the removal &/or disturbance of soil, mycorrhiza and associated hydrogeological and ecological processes that maintain the quality of land and soils – including for the adjoining natural areas.

B5-TF

For Carnaby Cockatoos alone, recent flock movement studies by Murdoch University's Harry Butler Institute and **Keep Carnaby's Flying** (Prof Kristen Warren & colleagues) <https://www.murdoch.edu.au/research/hbi/case-studies/securing-the-future-of-black-cockatoos> clearly demonstrates that Carnaby's Cockatoos rely on the patchwork of fragmented natural areas to move through the landscape. In addition, there is great significance of the forest ecosystems for endangered Baudins and Forest Red-Tailed Black Cockatoos amongst other fauna.

C1-IW

What is the impact of clearing, earthworks, roads, dust etc on the streams, wetlands, damplands, peat swamps within and adjoining the forests?

D1-AQ

Have the cumulative air pollution impacts of clearing, chipping, earthworks been fully assessed?

D2-GGE

Have the negative impacts on climate change been fully assessed?

F1-CI

This proposal to remove intact, natural habitat and ecological processes and their associated environmental services is another in the death of a 1,000 cuts.

The current practice of prescribed burning is resulting in destruction of biodiversity rather than its protection. Vertebrate fauna eg Numbats, Western Ringtail Possums (critically endangered), Quokkas and Black Cockatoos are being burnt, 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.

CONCLUSION

- 1. The UBC calls on the EPA to uphold their environmental principles, environmental factors and objectives and recommend PER level of assessment.**
- 2. The cumulative impacts of this proposal have not been adequately addressed.**
- 3. As we continue to learn about the complexities and interconnectedness of our natural ecosystems, the 10 year time frame does not provide flexibility. There also needs to be independent oversight.**
- 4. A 'Jarrah Forest National Park' and associated nature reserves need to be created and actively managed for conservation.**
- 5. UBC supports submissions by Birdlife WA, Conservation Council WA, Wildflower Society WA, WA Forest Alliance, the Beeliar Group, the Leeuwin Group and The Wilderness Society.**