

Enquiries: Jane O'Malley
Our Ref: 0090_2018_1015
Your Ref:

19 October 2018



Marion Fulker, Chairperson
Conservation and Parks Commission
17 Dick Perry Avenue
KENSINGTON WA 6151

Attention: Roland Mau

Email: Roland.Mau@conservation.wa.gov.au

Dear Ms Fulker

Public submission: Draft Mid-term review of performance of the Forest Management Plan 2014 – 2023 – call for comprehensive review in forest management

The Peel-Harvey Catchment Council welcomes the review of this very important Plan.

The Peel-Harvey Catchment Council (PHCC) is the regional body responsible for the Peel-Harvey Natural Resource Management (NRM) Region. The following comments are provided within the context of our mission statement : *'as environmental stewards we will encourage and enable effective catchment management to create a healthier natural environment in the Peel-Harvey by building community education and capacity, influencing and leading critical thought and environmental pride, and exemplifying and implementing best practice'*.

Forests of jarrah, marri and other unique south-west Australian tree species are a significant part of the Peel-Harvey Catchment and cover over 306,359 hectares of the catchments of the Serpentine, Murray and Harvey River catchments. They are part of the South-West Biodiversity Hotspot for fauna and flora, indicating their global recognition "where exceptional concentrations of endemic species are undergoing exceptional loss of habitat".

The Peel-Yalgorup Catchment also includes 188,337 ha of the Swan Coastal Plain, and the 26,000 ha Peel-Yalgorup Ramsar Site, a wetland of international importance (global Ramsar site 482).

Fifty-six percent (56%) of our community rate forests, bushland and native vegetation as one of their two highest environmental values in the Catchment (Advantage Communications and Research, 2018).

58 Sutton Street, Mandurah
Western Australia 6210
T: +61 8 6369 8800

www.peel-harvey.org.au

*We acknowledge the Noongar people as Traditional Custodians
of this land and pay our respects to all Elders past and present*

Our submission

The PHCC recognises that the 2014 – 2023 Forest Management Plan as an over-arching management document directing government policy and management across numerous bioregions of south-west Australia including the Jarrah Forest and Swan Coastal Plain bioregions.

In this context, we express our concern over the cumulative impact of multiple and over-lapping land use pressures on the jarrah forest, together with the effects of climate change. These land uses include mining and associated clearing and revegetation, recreation, timber harvesting including firewood collection, settlements and infrastructure provision. Human uses of the forest operate in an environment of long-term declining rainfall and increasing temperatures, spread of dieback disease and weeds, feral animals, and a regime of increased controlled burning.

While the mid-term review has methodically assessed government performance to implement the FMP according to numerous KPI's, **the Commission is urged to comprehensively review the Government's approach to forest management in light of the deteriorating condition of the northern jarrah forest (Perth to Collie) as outlined in the Mid-term Review.** The review should include an assessment of the feasibility of future use of the jarrah forest for timber extraction and the continued extensive clearing and mining of the forest for bauxite. These two extensive landuses (timber and mining) , overlain with all the other land uses, active threatening processes and climate change, are producing at best a forest which lacks the majesty of old growth jarrah forest, and at worst will veer towards a jarrah – marri woodland.

The PHCC is also deeply involved and committed to the protection and management of the Peel-Yalgorup Ramsar Site. With some hope that the Strategic Assessment of the Perth and Peel Regions may still boost government attention on the Ramsar Site and Catchment, the PHCC remains concerned that the wetland's water quality continues to decline and habitat is being lost through clearing and degradation.

KPI 1. Whole of forest condition

The decline in the condition of healthy ecosystems listed across significant areas of the whole of forest is of particular concern to the PHCC. Based on Figure 2 a large portion of the area with declining vegetation density is within the Peel-Harvey Catchment. The PHCC agrees with the mid-term report's assessment that this decline in vegetation density is attributable to climate change (long-term reductions in rainfall and increases in temperature). Current logging practices are exacerbating this decline through changing the forest structure. Further, the PHCC generally agrees with the Commission's recommendation (R1), but adds a greater sense of urgency, and the allocation of appropriate resources within State Government to assess changes in forest condition.

The review identifies that there is not the management tools to maintain condition, and therefore greater collaborative efforts are required to review practices and commercial uses of the forest, if we are maintain this globally recognised and highly valued community assets.

PHCC Recommendations:

That the State Government:

- **allocate appropriate resources and expertise to assess the causes of lower vegetation density as observed through LANDSAT imagery over the past 10 years; and**
- **assess any other changes in forest biodiversity and key ecosystem functions that may be linked to lower vegetation density, logging practices, long-term reduced rainfall or increased temperatures**
- **Suspension of forest logging until there is a greater understanding of the extent and nature of long term climate change and/or other causes of condition decline**

The PHCC is wary of any proposed Departmental management response to climate change (page 7) that includes silvicultural and other treatments in state forest. With reductions in forest productivity due to climate change, the first management response should be to better understand the changes in ecosystem function and health before investigating silvicultural responses. The Commission does not appear (as indicated in the Draft Mid-term Review) to have any evidence at this stage that Government understands the full or actual changes in forest condition due to climate change. Changes in vegetative cover are but one element of forest condition.

PHCC Recommendation: That the Department be requested NOT to investigate opportunities to apply silvicultural and other treatments in State forest, and instead be required to invest resources into better understanding changes in forest biodiversity and key ecosystem functions that may be linked to lower vegetation density, long-term reduced rainfall or increased temperatures.

KPI 1.2 Increase in formal protection of regionally significant vegetation

The PHCC is extremely disappointed that the Government has not progressed any promised vesting changes since 2013. This confuses public recognition of these areas and the elevated prioritisation of resource allocation towards management of these areas. In terms of the Peel-Yalgourup Ramsar Site, Government has failed to advance the promised inclusion of Black and Goegrup Lakes into the Ramsar Site over the past 10 years. This is despite there being no encumbrances or barriers to the nomination. The establishment of the Peel Regional Park over large parts of the Ramsar Site has been a similarly disappointing.

PHCC Recommendation: That State Government provide a public statement on the status and implementation dates of all proposed vesting changes, including establishment of the Peel Regional Park and extensions to Ramsar sites, by October 2019 for areas within the Forest Management Plan (note the FMP area includes the Swan Coastal Plain).

KPI 2 Threatened Ecological Communities (TEC)

The Mid-term review should acknowledge that the new Biodiversity Conservation Act recognises TEC's, and that new TEC's have been recognised under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act 1999) since 2014. The mid-term review report should be corrected in this regard (Page 10). For example Banksia Woodlands of the Swan Coastal plain were recognised as a TEC in 2016 under EPBC Act 1999.

The mid-term review also notes that in terms of TECs, 'Vegetation condition was generally maintained where active management, such as weed control and infill planting, was undertaken'. 'This statement does not provide the full picture. Through working cooperatively with the Department on an operational level over many years, it is made clear that the Department has very little, if any funds, to carry out basic management in TEC's on the Swan Coastal Plain, let alone its coastal plain Nature Reserves (e.g. weed control and dieback management). The mid-term review should acknowledge that the state government's long-term and continued fiscal restraint has meant that the Department does not have the resources to undertake basic management works in its Nature Reserves and TEC areas, and may prohibit the implementation of any TEC Measurement Protocol.

The PHCC supports the mid-term reviews Recommendation 3 (TEC Measurement Protocols for TECs).

PHCC recommendation: That a baseline assessment of a comprehensive selection of TEC sites be substantially commenced by October 2020 using the measurement (monitoring?) protocols referred to in Recommendation 3.

KPI 3 Ramsar and nationally listed wetlands

The PHCC welcomes the consideration of Ramsar Wetlands within the FMP framework, but is concerned that the monitoring to support measurement of this KPI is very limited and under-resourced. The reporting of this KPI in the mid-term review does not provide an accurate picture (nature and extent) of wetland condition, at least in terms of the Peel-Yalgorup Ramsar Site.

Management planning, management and monitoring for the Peel-Yalgorup Ramsar Site has been a partnership initiative of the Peel-Harvey Catchment Council and state conservation and water management departments since the mid-2000's.

Through this partnership, an assessment of condition of the Peel-Yalgorup Ramsar Site for its limits of Acceptable Change (LAC) conducted in 2017 for the Peel-Yalgorup Technical Advisory Group found that:

- 19 LACs are being met
- 22 LACs Not met
- 18 LACs have insufficient data to assess if they have been met/not met.

This differs from the mid-term report's assessment (that 11 of the 37 LACS for the Peel-Yalgorup System are regularly exceeded, page 13), and more accurately reflects the limited resources that government has allocated to monitoring Ramsar wetland condition health. The use of the term 'regularly exceeded' in regard to LACs is also questioned as very few LACs are regularly measurement or monitored.

The mid-term review report and the Commission should more comprehensively examine the management of Ramsar Wetlands, and how government is managing and monitoring Ramsar Wetlands. The current recommendation (Recommendation 4) to review measurement protocols for Ramsar and nationally listed wetlands needs to be broadened to address the key underlying issues of management coordination, vesting of Ramsar wetlands, and sufficient resource allocation, as identified in the Auditor General's Report on Management of Ramsar Wetlands in WA of 2016.

Using the Peel-Yalgorup Ramsar Wetland System as an example:

- 1) Development and implementation of measurement or monitoring protocols, even for one Ramsar Site is very complex and challenging, and needs reliable, recurrent resourcing. There is no such funding for the Peel-Yalgorup Ramsar Site.
- 2) The state government does not statutorily recognise the global significance of Ramsar Wetlands. This has implications for government resource prioritisation; there is a lack of a state framework for protection and management of wetlands of global or national significance.
- 3) There is a lack of state resources to implement even the most basic recommendations for the Peel-Yalgorup Ramsar Site (e.g. nomination of Black and Goegrup Lakes for inclusion in the Peel-Yalgorup Ramsar Site), or management of critical issues, such as acid sulfate soils at Lake McLarty.
- 4) The State government does not have in place a monitoring protocol that would enable it to support claims made in the mid-term review that 'the ecological characters of designated Ramsar wetland sites and the criteria that they were recognised and listed for have not changed during the reporting period' (Page 12).

PHCC recommendation: The mid-term review should re-assess FMP/Departmental performance towards KPI 3, including measurement protocols on Ramsar Sites and wetland management resourcing, in the context of the recommendations of the Auditor General's Report on Management of Ramsar Wetlands in WA of 2016. Any work towards Ramsar measurement protocols should consult with individual Ramsar Site management groups, such as the Peel-Yalgorup Ramsar Site Technical Advisory Group (Administered by the Peel-Harvey Catchment Council).

PHCC recommendation: The Commission request the Department to clarify the involvement of non-government groups/community groups in the management of Ramsar wetlands in light of the Department's proposed management response (page 13).

KPI 5 Threatened fauna

The PHCC is concerned that this KPI has not been met and is trending downwards. The number of threatened fauna has increased from 112 to 120 between 2013 and 2017, and there is little evidence of state government effort to adequately monitor the condition of key fauna species.

It is of significant concern that the monitoring efforts and resources allocated by Government are insufficient to support an accurate assessment of the state of Threatened Fauna. As a case in point, while the Mid-term Review rightly states that the Great Cocky Count (GCC) results 'should be treated with some caution' given the limitations of the survey methodology (page 19), it fails to mention the GCC's value in providing data where government has failed to fund a more thorough and scientifically valid monitoring program for these iconic, threatened bird species.

Monitoring issues aside, it is noteworthy that three aquatic species have been added to the Threatened Fauna list in this time, (which may be a result of focused research, and is of concern given a drying climate).

In terms of the very important issue of the potential impact of silvicultural and fire management practices on Threatened Fauna, the mid-term review provides little confidence that these species are being adequately protected:

'In this FMP there was acknowledgement that the conservation of some fauna species may require specific measures and modifications were recommended to enhance biodiversity and other outcomes through revision of relevant documents pertaining to silviculture and to fire management. This would ensure that where practicable, local scale operations consider appropriate measures to minimise loss of legacy habitat elements (such as tree hollows and fallen, hollow logs). The information provided for the mid-term review is deficient for assessment for these particular species'. (page 20).

Going forward, we call on the Commission and Government to overhaul the way in which Threatened Species are managed in forest areas. This includes making all logging and forest management activities subject to the Environment Protection and Biodiversity Conservation Act 1999 when the Regional Forest Agreement is renewed in the next year.

In terms of the proposed departmental management response, the PHCC encourages the Department to work with all relevant community groups, and not just recreational hunting groups as cited on page 21. The PHCC already has working relationships with the Department on the Swan Coastal Plain and Dryandra State Forest, with the potential for new collaborations in jarrah forest areas.

PHCC Recommendation: The Commission recommend that State Government implement a Threatened Fauna (and Flora) Monitoring and Recovery Program, including foundational work to review the condition of key species by Jan 2020

PHCC recommendation: That the Department be encouraged to continue to work with a broad range of non-government organisations, and that the mid-term review be revised to recognise the work that the Department already undertakes in partnership with regional NRM groups such as the Peel-Harvey Catchment Council.

KPI 6 Distribution of fire age

The PHCC recognises the intent of planned fire in protecting human life, property and biodiversity.

Figure 5 (Fuel age distribution in the FMP area) shows significant areas of forest are being burnt more frequently than even the target fuel age (i.e. large areas of forest are being burnt within 10 years of the last fire). Many of these areas were burnt through landscape-scale bushfires, with the rest burnt through prescribed burning.

It would be important to see Figure 5 differentiating the area of forest burnt through prescribed burns, versus the area burnt through wildfire, for each fuel age (years since last burnt).

With long-term drying and warming and increases in extreme events, the incidence of landscape-scale wildfire will increase, and this should trigger regular review of prescribed burning policies and operations.

It is interesting to note that the KPI framework does not address the potential for forest fire (planned and unplanned) to impact on biodiversity or forest health, and a related monitoring requirement. As stated on page 24 in the section on *Distribution of fire age*.....

'The Commission is mindful however that, as detailed in KPI 1, there is uncertainty around the health of forest ecosystems with landscape scale changes observed in vegetation density. How this change in vegetation density relates to the goals for vegetation structural diversity and the health and resilience of forest ecosystems should be clarified.'

Given that there is reasonable scientific concern over the effects current prescribed burning policies and practices appear to have on biodiversity and forest health, it is recommended that any reviews related to prescribed burning are made public, with opportunities for public comment. (e.g. Little Evidence for fire-adapted plant traits in Mediterranean climate regions, SD Bradshaw, KW Dixon, SD Hopper, H Lambers & SR Turner, Trends in Plant Science, February 2011, V 16, No.2)

PHCC Recommendation (Modified Recommendation 8): That the performance target used by the Department for the KPI for distribution of fire age be reviewed in consultation with the Commission, and with a full public comment period, prior to the next FMP.

KPI 7 Effectiveness of fire planning and management

The actual outcomes that have been achieved to enable this KPI to have been met are unclear and have not been stated. The statement 'The number of burns not completed and requiring further ignition contributes to the low proportion of burn plans with reported success criteria' (page 25) suggests that success is describing ignition and area burnt, and not a range of biophysical and operational outcomes related to fuel loads, fire intensity, mosaic burn pattern (pockets unburnt/burnt), protection of environmentally sensitive areas etc.

PHCC recommendation: That the Mid-term Review report on this KPI be expanded to provide more detail on the actual success criteria that have been achieved/not achieved within the respective Regional Fire Management Plans.

KPI 8 Weeds, pests or disease pathogens

2.8.1 Weeds

The PHCC recognises the significant challenge faced by government and other land managers to manage threats such as weeds and diseases.

However, the PHCC questions the breadth of information that has been used to draw the conclusion on page 27 of the 'overall positive trend for the effective of management of priority weeds' in the public conservation estate.

This conclusion is drawn on the basis of an estimated 36 sites shown in Figures 7a to 7c where 'long-term management actions were applied' (page 28), not on an extensive assessment of the hundreds of reserves and thousands of public conservation estate in the FMP area.

The Commission in the Draft review has effectively stated the same: 'However, there is limited information provided for this KPI on the prioritisation of weed management as it relates to the regional nature conservation plans (see recommendation 10) (page 29)

PHCC recommendation: That the assessment of KPI 8 be re-evaluated using a credible methodology.

2.8.2 Pests

The PHCC agrees with the Commission's Recommendation to improve measurement of this KPI (Recommendation 10).

KPI 10, 11, 12 and 13

- KPI 10 Stream condition and groundwater level
- KPI 11 Effectiveness of silviculture for water production
- KPI 12 Increased knowledge of trends in climate
- KPI 13 Adaptive response to changing climate

The continued significant decline in streamflow and groundwater levels is of significant concern to the PHCC (Table 7 and Figure 8). This change in water availability for forest growth and aquatic fauna is significant, and is one such impact that should trigger a comprehensive review of the government's forest management policy in the lead up to preparation of a new forest management plan in 2023. Lowering of groundwater tables is also linked to rehabilitation following bauxite mining, and regrowth following logging.

The PHCC is supportive of Recommendation 14 in relation to continued research to understand implications of climate change on ecological function, biodiversity and forest health, and related Recommendation 15. However, these reviews should be led by State Government, and not the Department.

PHCC Recommendation: That the Commission advise the state government should commit to a full review of all government statutory agreements, contracts and policies related to use and management of the state's south-west forests in light of long-term changes on rainfall and temperature compounding land use pressure and threatening processes. This review should address matters including:

- **Impact on forest values of long-term reduction in rainfall and increased temperatures**
- **Fire management, and**
- **Land uses including commercial timber extraction and mining.**

KPIs 16, 17 and 18 Commercial logging

KPI 16 Removal of log products relative to allowable cut, KPI 17 Silvicultural outcomes, KPI 18 Regeneration of harvested area

The volumes of wood products removed from forested areas (Table 8) demonstrates the overall reduction in yields (long-term growth –rates) and the shift towards lower quality wood volume, listed as 'other bole volume'. This long-term reduction and down-grading in yield is likely to be more pronounced in the northern jarrah forest. Current allowable yields of jarrah show that most (two-thirds) of harvestable jarrah volume is third-grade or of lower grade (other bole volume). It is not clear how much of this volume is being considered for sale to energy markets (burning). Use of native forest to support energy production is not supported.

The PHCC questions the long-term continued use of the Northern Jarrah Forest for commercial logging operations, and a public discussion is needed about the relative social, economic and environmental benefits of use of the forest for greater tourism and recreation in place of

commercial logging. To support this discussion, expert assessments of the recreational, tourism, and commercial logging potential of all southwest forest regions should occur commence as soon as possible.

The PHCC also questions how much of the wood product yield is harvested from areas prior to mining (bauxite mining), as this is not made clear in the mid-term review.

PHCC Recommendation: That the Commission consider the non-extractive social and economic values of forests as part of preparations towards development of a new FMP, including the need to better understand the economic value of current and potential future uses such as recreation, tourism, honey production and similar.

KPI 22: Visitation & facilities

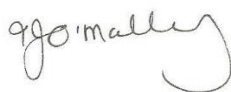
To support the findings of the review, our anecdotal evidence suggests that recreational use of forested areas continues to grow significantly. For example, Jarrahdale and Dwellingup are very popular locations especially for bush-walking and mountain biking, and camping sites at the Lane-Poole Reserve are often fully booked weeks in advance. Visitors and residents are enjoying the forests for their natural and aesthetic values. While there has been significant public investment in high-profile regionally significant assets, many local trails and amenities are receiving little or any maintenance.

PHCC recommendation: The Commission assess the extent to which public demand for forest recreational opportunities are being met and evaluate the economic return of tourism and recreation vs current practice.

Thank you for the opportunity to provide comment on the proposal. We would welcome the opportunity to discuss our submission with the Commission at its earliest convenience.

In the interim, should you require further information, please do not hesitate to contact Jane O'Malley on (08) 6369 8800 or email admin@peel-harvey.org.au.

Yours sincerely



Jane O'Malley
Chief Executive Officer

References

Advantage Communications and Research 2018 *Peel-Harvey Catchment Council 2017/18 Baseline survey of community attitudes towards NRM and the natural environment - RESULTS SUMMARY REPORT*, Peel-Harvey Catchment Council, Mandurah.