



Hon. Diane Evers MLC
Member for the South West Region

Attn: Ms Lauren Lesiti, Committee Clerk
Standing Committee on Environment and Public Affairs
Parliament House
PERTH WA 6000

Dear Committee Members,

PETITION NUMBER 53 – Protect high conservation forests.

Thank you for the opportunity to provide this additional brief response to the submissions from the Minister for Water; Fisheries; Forestry; Innovation and ICT; Science, and the Minister for to the Standing Committee on Environment and Public Affairs, regarding Petition No. 053 – Protect high conservation forests.

The Hon Dave Kelly MLC, Minister for Forestry, notes that the Western Australian Forest Alliance (WAFA) proposal ‘does not comprehensively outline the issues or solutions to enable a transition from native forest to plantation logging.’ This is to be expected, since WAFA does not have the resources necessary to undertake development of a highly detailed transition strategy – that is the State Government’s job. Nonetheless, WAFA’s high level proposal for a transition from native forest to plantation logging is sound - it is evidence-based and thoroughly considered. It is assumed that the State Government would employ the significant resources at its disposal to do the additional work required to fully develop and implement a transition strategy, hence the petitioners’ request for the LC to “enquire into the most effective and timely means to protect HCVF and transition the timber industry”.

The Hon Dave Kelly MLA, Minister for Forestry notes that the Forest Products Commission (FPC) has ISO 14001 compliant Environmental Management System, and is certified under the FSC Controlled Wood Standard (FSC-STD-30-01 0; FSC-C120630) for areas of pure and mixed karri forest that the FPC harvests. While the FPC’s efforts to achieve accreditation are to be encouraged, accreditation is no guarantee of forest protection. The accrediting body itself has criticised the FPC. When Accrediting Services International, (ASI) undertook a thorough review of the FPC’s activities in 2016, it found that the FPC could underestimate Type II Old Growth by focusing on a definition that does not consider other old growth attributes besides tree senescence. FPC’s logging practices therefore threaten the type of High Conservation Value Forests the FSC aims to protect, since they arguably do not conform with Section 5.1 and 5.2 of FSC-STD- 30-010 V2.0 of the certification



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requirements. The FPC's definition of Type II Old Growth may be resulting in an underestimation of the extent of this type of high conservation value forest and therefore failing to protect it.

Furthermore, the FPC's current accreditation is not sufficiently comprehensive to ensure protection of all high conservation value forests. The FPC does not have FSC or other independent accreditation for activities related to harvesting jarrah, for instance.

Clearly, accreditation does not ensure that the FPC's ongoing activities are adequately governed or evaluated. As we know, the FPC recently bulldozed old growth forest in Barrabup Forest for a road - an action that only came to light due to the vigilance of local community members.

These sorts of failures are particularly inexcusable since a significant number of endemic forest-dependent species are in decline and there is clear scientific evidence that we need more protected forests to ensure their survival¹.

The Minister for Environment describes the history of forestry and forest policy. However his response does not address Labor's pre-election promises that the community now expects to be honoured, which were to:

- “Immediately conserve High Conservation Value forests to provide protection for some of WA's most threatened wildlife including the forest Black Cockatoos, Western Ringtail Possums, Numbats and Quokkas;
- Move to complete the transition of the native forestry industry into sustainably managed plantations and farm forestry with a focus on high value, locally processed, job-rich enterprises;
- Plan for the forestry jobs of the future;
- Restart the process of establishing approved conservation reserves identified in the Forest Management Plan 2004 – 2013; and
- Review the governance around timber industry planning and management”.

Yours sincerely,



Hon Diane Evers MLC
Member for South West Region
25 June 2018

¹ <http://www.environment.gov.au/biodiversity/threatened/species/pubs/25911-conservation-advice-11052018.pdf>
<http://www.environment.gov.au/biodiversity/threatened/species/pubs/769-conservation-advice-15022018.pdf>