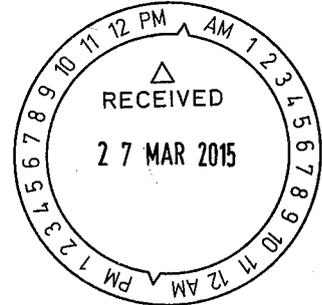




Minister for Water; Sport and Recreation; Forestry

Our ref: 52-03138

Hon Simon O'Brien MLC
Chairman
Standing Committee on Environment and Public Affairs
Parliament House
PERTH WA 6000



Dear Chairman

PETITION NO 74 – MOWEN FOREST LOGGING

I write in response to your letter of 24 February in relation to Petition No. 74 on Mowen Forest. I am pleased to provide advice and comment on the key areas identified.

In December 2013 the Minister for Environment signed off on the Forest Management Plan 2014-2023 (FMP). This is an exhaustive planning process over 2 years led by the Conservation Commission of Western Australia (CCWA) working through the agency of the Department of Parks and Wildlife (Parks and Wildlife). The preparation of the plan involved other key government agencies, independent experts and a wide range of stakeholders including conservation groups. The plan was assessed by the Environmental Protection Authority and authorised by the Minister for Environment. The FMP came into operation on 1 January 2014. The Forest Products Commission (FPC) only undertakes timber harvesting in the areas identified in the FMP.

Threatened fauna

The FMP identifies the approach adopted to protect threatened and priority species and communities and how specific measures necessary to protect them are determined, approved and included in conditions. The FMP also details specific additional protection measures that have been included in undertaking disturbance activities to improve the overall management of the threat to threatened species.

The FMP provides for nature conservation values on the vested lands by setting aside lands on which biodiversity conservation is a priority or dominant use and setting the conditions of access to other lands to ensure that the biodiversity values are maintained.

Where harvesting is permitted strict procedures and policies apply in line with the FMP. A detailed review of all forest values is undertaken by FPC as required by Parks and Wildlife. This review is also endorsed by Parks and Wildlife prior to operations commencing. One of the values considered in the review and planning checklist is the identification of the likelihood of threatened species being present in the coupe, and where appropriate, measures to protect these values.

Harvesting is managed to preserve important habitat elements including mature trees with hollows (habitat trees and potential habitat trees), hollow logs, and secondary storey plants.

Dieback Risk

The FPC is committed to preventing the spread of Phytophthora dieback. Harvesting operations of the FPC are covered by hygiene management plans approved by Parks and Wildlife.

Salinity Risk

The FPC is guided by the FMP and supporting documents in managing salinity risk caused by forestry operations. The Blackwood Plateau is not identified as an area of salinity risk in the FMP.

Detrimental Social and Financial Impacts

The production and sale of timber from Mowen will generate economic activity that is spread throughout the south-west region. It is estimated that about 7,300 cubic metres of graded sawlogs will be produced from this area as well as a quantity of charcoal and firewood logs.

The industry provides direct employment in the management of the forests, the harvesting and the delivery of logs, the processing of logs into timber, the processing the timber into products for consumption, the processing of residues into firewood and charcoal, and the final consumption of wood in housing. Each of these phases of the production chain has indirect demands for resources and services.

The products of the timber industry are widely used as part of the tourist industry in the furniture and artisan galleries throughout the region. Some of the finest artisans in the State manufacture and display their work based in part on local timber supplies.

Climate Change and Water

The potential impacts of climate change are considered in the preparation of the FMP. It is well understood that the hydrology of the south-west is inextricably linked with the management of the land, including the forests. It is also well-known that rainfall has diminished considerably over the region during the past 40 years. The FMP notes that climate change may threaten forest health, in particular the eastern margins and the aquatic systems. Management to reduce forest water use by thinning may be an appropriate mechanism to mitigate climate change impacts.

Aboriginal Heritage

The procedures adopted in the planning of the Mowen coupes fully meet the requirements for the protection of Aboriginal heritage. FPC works closely with the South West Aboriginal Land and Sea Council to identify and protect Aboriginal heritage. A protocol regarding this consultation process has been developed.

In regards to the Mowen coupes FPC has consulted with family representatives as identified by the South West Aboriginal Land and Sea Council. There is one

registered heritage site in the Mowen coupes. This is site 20434, a tributary of the Blackwood River. This site is well protected by a retained undisturbed stream reserve.

Reduced quality of timber

The Department of Parks and Wildlife have estimated that the quantity of first and second grade sawlogs in the Mowen coupes to be 7,300 cubic metres. This quantity forms part of the sustained yield of sawlogs over the ten years of the FMP.

There has been very significant change to the scale and structure of the sawmilling industry following the very large increases in forest reservation in 2004. The quantity of timber made available to industry was reduced significantly and all old growth forest was reserved, as well as many areas of regrowth forest. As a result timber industry access to larger mature logs was restricted and available logs are significantly smaller.

The existing sawmilling technology is still geared to processing larger logs. There is a continuing need for re-investment to improve efficiency when processing smaller logs. There has also been a change in log grading to ensure that log sizes are as large as possible – even though this may mean some lower grade wood being included. As a result FPC no longer produces first and second grade sawlogs, instead it provides bole and general purpose sawlogs that contain a blend of log qualities.

Road upgrade activities

Prior to commencing any disturbance activity Parks and Wildlife require that the proponent undertake a checklist to ensure that all values and threats are identified and protective measures are put in place. The procedures for assessing disturbance activities are defined in the Planning checklist for disturbance activities (FEM 019).

For Mowen 02 the planning checklist for disturbance activities (Form 019) was completed by FPC and endorsed by Parks and Wildlife on 12 December 2013. This approval has a life of 12 months.

FPC submitted its request to Parks and Wildlife for a renewed Form 019 on the 5 December 2014. This was re-assessed and re-endorsed by Parks and Wildlife on 16 January 2015 with an amendment to reflect the location of old-growth forest, assessment of threatened species, and the first engagements with the Margaret River Regional Environment Centre in November 2014. These changes had no bearing on the roading operation.

FPC approved its contractor recommencing road maintenance activities in Mowen 02 on 9 January 2015, 1 week prior to the re-endorsement. Work was conducted from 12-14 January 2015. Discussions between Parks and Wildlife's Sustainable Forest Management Officer and FPC agreed that undertaking road maintenance without an updated Form 019 was acceptable, as the activities were taking place on the existing cleared road alignment and would not disturb vegetation. However, Parks and Wildlife procedures (FEM 019) indicate that some road maintenance activities require a current Form 019 to be in place.

FPC has raised the matter as an incident in its environmental management system which will require further investigation and the implementation of preventative actions.

Please note that the roading activity that was undertaken from 12 January 2015 was consistent with the subsequently approved FEM 019 and no environmental damage occurred. If a breach occurred, it likely to have been of minor procedural nature.

Total Fire Bans

The Regulations of the *Bush Fires Act 1954* define the requirements of a Total Fire Ban and of a Harvest and Vehicle Movement Ban. A Total Fire Ban requires that certain activities likely to be causes of ignition cease. Agricultural activities, including forestry, are explicitly excluded from this ban. Forestry is regarded as an agricultural activity. Harvest and Vehicle Movement Bans require that all activity ceases. This includes forestry.

In addition to meeting these requirements FPC undertakes the fire precautionary actions required by Department of Parks and Wildlife. This can mean that operations stop half way through a day, and harvesters have firefighting equipment on-site.

Habitat trees

Treemarking is only performed by suitably accredited staff who are able to achieve and consistently maintain the standards outlined in the Parks and Wildlife *Silviculture Guidelines for Jarrah Forest* (Guidelines). The competency of treemarkers is initially determined and assessed on an ongoing basis by senior FPC staff and further monitoring is also undertaken by Parks and Wildlife.

Advice from the Department of Parks and Wildlife in 2015 following an assessment of treemarking in Mowen was that FPC has exceeded the number of habitat trees required for retention, demonstrating a conservative approach by FPC.

Management guidelines

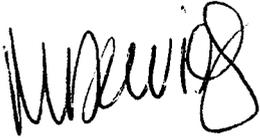
The responsibility for the production of guidelines is specified in the FMP, and the current timetable for their completion is contained in the FMP, which supercedes the Forest Management Plan 2004-2013. FPC is not responsible for producing these documents.

Consultation

The FMP is the result of a period of intensive planning, research, consultation and review undertaken by the Conservation Commission. It endeavours to balance a range of forest uses, the conservation of biological diversity, socio-economic benefits and cultural heritage. As part of the development of the plan, a draft was released for public comment by the Conservation Commission and over 5,000 public submissions were reviewed. By providing the opportunity for stakeholder input and consultation throughout the process, specific values were identified and used to finalise the FMP.

The decision to make areas of forest available for timber harvesting is done through the FMP. Once the Minister for Environment signs off the FMP it is a legal document that governs forest management. The FPC enters into contracts on the basis of being able to access the forest that is available for timber harvesting.

The FPC is undertaking timber harvesting in the Mowen Coupes as permitted under the FMP. While some community members would prefer this did not occur, the area being harvested has been assessed as available after consideration of many factors.

A handwritten signature in black ink, appearing to read 'Mia Davies', with a stylized flourish at the end.

Hon Mia Davies MLA
MINISTER FOR FORESTRY

26 MAR 2015