

17 December 2022

Forest Management Plan 2023 – 2033
Department of Biodiversity, Conservation and Attractions
Locked Bag 104
Bentley Delivery Centre WA 6893



Environment Institute
of Australia and
New Zealand Inc.

Via email: forestmanagementplan@dbca.wa.gov.au

Dear Sir / Madam

Re: Submission on Draft – Forest Management Plan 2023-2033

The Environment Institute of Australia and New Zealand (EIANZ or the Institute) Western Australia Division (EIANZ-WA) is pleased to provide feedback on the Department of Biodiversity, Conservation and Attractions (DBCA) draft *Forest Management Plan 2024-2033*.

EIANZ is a not-for-profit professional association for environmental practitioners. The Institute promotes independent and interdisciplinary discussion on environmental issues and advocates good practice environmental management delivered by competent and ethical environmental practitioners.

We forward this submission on behalf of EIANZ-WA members. Currently, we have over 200 members in WA, while across Australia and New Zealand, we have over 2,100 members. Our members come from a range of technical disciplines, including certified environmental practitioners (CEnVP), ecological consultants, environmental advocates, heritage consultants, researchers, and environmental specialists working in government, industry, and the community.

Overall, EIANZ-WA views the management actions outlined in the Draft Forest Management Plan as a positive step towards the ongoing conservation of the south-west forests. We provide the following commentary on the Draft Forest Management Plan for your consideration.

General Observations

EIANZ-WA commends the detailed description of the threats and pressures facing the south-west forests. This section does not shy away from the issues and threats that require management. The discussion highlights the very real and serious threats to the persistence of our forests and the work needed to protect and preserve these ecosystems.

The commitment to expand the conservation estate for the improved protection of at least 400,000 ha of forest ecosystems is a positive step supported by the Institute. Map 12 presents a visualisation of these proposed locations. On this map the 'New Reserve Proposal' is very difficult to see, it is recommended to revise this map so that these locations can be easily and quickly identified.

Plan Implementation and Adaptive Management

On page 52, Section 5.1 states "*the plan will be implemented according to available resources*". This does not seem adequate, particularly in the context of the threats and pressures facing the south-west forests which are very clearly discussed in Part B of the Plan. If there are no available resources this would considerably hinder the south-west forests and allow the threats identified to further manifest. Adequate resources must be made available to ensure the activities in the Plan can be implemented to achieve the overall strategic goals.

A key component of the Plan is the commitment to enter into cooperative and joint management agreements with the six traditional owner groups – Whadjuk, South West Boorah, Gnaala Karla Booja, Wagyl Kaip and Southern Region, Ballardong and Yued. This approach is a positive step towards recognising and implementing traditional knowledge into land management practices. EIANZ would recommend that this goal be strengthened by rewording to include conservation and land management activities; *"To value and protect Noongar cultural heritage and support Noongar Traditional Owner involvement in conservation and land management activities"*.

The Plan discusses a new management approach for south-west forests via the proposed activity of ecological thinning. These activities require stronger management to ensure the desired environmental outcomes are achieved. Otherwise, ecological thinning has the potential to have adverse effects on the south-west forest ecosystems. The following suggestions are made to improve the clarity of the proposed activities and to manage these to ensure the desired environmental outcomes are achieved:

- Clearly outline the area, methods and performance measures that will be required for the ecological thinning project. Taking into consideration requirements for number of trees to be removed, restrictions on removal of certain types and sizes of trees and the types of equipment that will be used to limit other risks,
- Clearly outline the management protocols in place to ensure ecological thinning activities are undertaken in a way to minimise other adverse impacts such as introduction and spread of weeds and pathogens or over-harvesting, and
- Include a monitoring program to ensure that ecological thinning activities are having the desired outcome and that an adaptive management approach can be taken.

The ecological thinning activities along with other planned disturbance activities are assessed using the department's Disturbance Approval System (DAS). The management activities in Table 7 relating to DAS state *"Report periodically on the total extent of CALM Act land disturbances, including areas disturbed in that year and areas remaining under rehabilitation"*. It is unclear what is included in this reporting, this should be made clearer including whether this relates only to activities undertaken by the Department or if this includes third party activities on CALM Act land. Reporting periodically is not adequate to determine trends and support adaptive management, rather a reporting period should be time bound and this should be included in the Plan. These reports should be publicly available, either independently or through a State of Environment reporting program to provide transparency regarding achievement of the plans objectives to improve the quality of the Forest reserve system.

A key component of the adaptive management approach is forest health monitoring. The draft Plan provides very little information on what forest health monitoring will occur, how often monitoring activities will occur, who will undertake these activities and the performance indicators to be achieved. The Plan states that monitoring information will inform decision making for ongoing forest management for the life of the Plan. Providing more information on forest health monitoring within the Plan would provide further clarity on the success of the plan on meeting the objectives.

Other Comments

Throughout the document the Noongar names of species have been used, for instance on page 47. The Institute commends this approach and the recognition of these names.

Throughout the document acronyms are used that have not been defined in the main body of the document. These are provided below for your consideration:

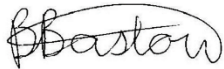
- On page 32 the acronym BRM is used, this has not been defined prior to the first use.
- On page 40 the acronyms TEC and PEC are used, these have not been defined prior to the first use.

- On page 52 the acronym KPI is used, this has not been defined prior to the first use.

It is best practice to spell out acronyms the first time they are used in the body of a document. It is acknowledged these are included in a glossary at the end of the document.

We thank you for the opportunity to comment on the Draft Forest Management Plan 2024 – 2033. If there are any queries regarding this submission, please contact Belinda Bastow, President EIANZ-WA Division on wa@eianz.org.

Yours sincerely

A handwritten signature in black ink that reads "BBastow". The signature is written in a cursive style with a large, sweeping flourish over the "B" and "astow".

Belinda Bastow
President
EIANZ – WA Division



Environment Institute
of Australia and
New Zealand Inc.

About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ, the Institute) is a professional association for environmental practitioners. The Institute supports environmental practitioners and promotes independent and interdisciplinary discussion on environmental issues. The Institute also advocates environmental knowledge and awareness, advancing ethical and competent good practice environmental management.

The Western Australian (WA) Division currently has over 190 members while EIANZ has over 2100 members. Our members come from a range of technical disciplines and industries and include environmental consultants, ecologists, advocates, managers, and impact specialists working in government, industry and the community.

A Certified Environmental Practitioner Scheme (www.cenvp.org) is also in place to assess and certify competent experienced environmental practitioners working in government, industry and the community. This includes specialist competencies such as Impact Assessment, Ecology, Land Rehabilitation and Contaminated Lands.

The EIANZ is an advocate for environmental assessment, management and monitoring investigations and reports being certified by suitably qualified and experienced persons for the completeness and scientific rigor of the documents. One of the ways of recognising a suitably qualified practitioner is through their membership of, and certification by, an organisation that holds practitioners accountable to a code of ethics and professional conduct, such as the EIANZ.

The EIANZ is a not-for-profit, charitable organisation incorporated in Victoria, and a registerable Australian body under the *Corporation Act 2001* (Cwth), allowing it to operate in all Australian jurisdictions.