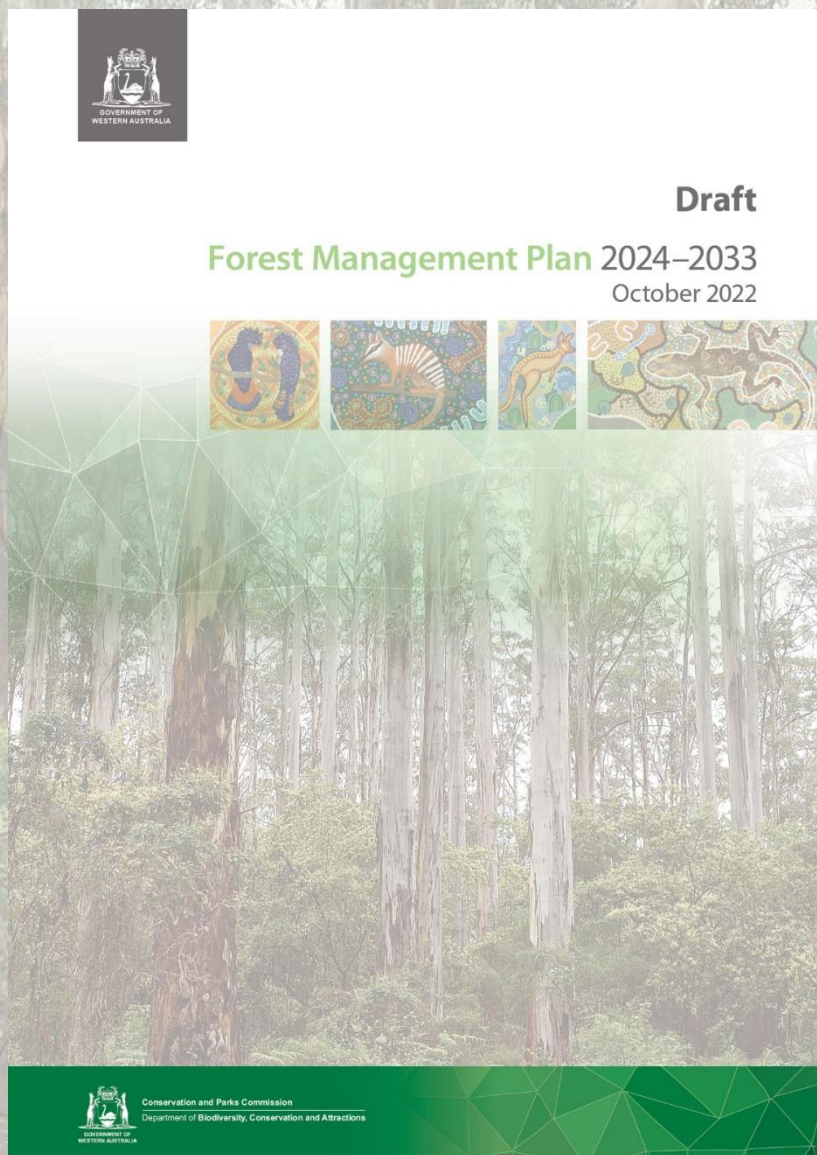


# Summary of public submissions on the Draft Forest Management Plan 2024-2033

April 2023

Department of Biodiversity, Conservation and Attractions



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# Introduction

This document provides a summary of public submissions on the *Draft Forest Management Plan 2024-2033* (Draft FMP) and resultant changes incorporated into the *Forest Management Plan 2024-2033* (FMP / the plan).

The Draft FMP was prepared by the Department of Biodiversity, Conservation and Attractions (DBCA or the department) on behalf of the Conservation and Parks Commission (the Commission) and released for a two-month public comment period from 18 October to 18 December 2022. The public comment period and the supporting communication and engagement activities were undertaken to meet the public review requirements for a management plan under section 57 of the *Conservation and Land Management Act 1984* (CALM Act).

## Draft plan distribution

The release of the Draft FMP was supported by the following communication and engagement activities to ensure broad public and stakeholder awareness of the public comment period:

- Media statement from the Minister for Environment 18 October 2022.
- Publishing the draft plan on the Commission and DBCA websites
- Notice in the Government Gazette on 18 October 2022
- Advertising in *The West Australian* and community newspapers throughout the south-west – see Appendix A – Print Advertising schedule
- A4 double-sided inserts in community newspapers throughout the south-west – see Appendix A – Print Advertising schedule
- Notifying more than 1000 registered stakeholders of the public consultation period through three issues of the FMP eNewsletter
- Letters to more than 100 key stakeholders and government agencies
- Electronic copies of the Draft FMP provided to 24 regional local governments, 11 regional public libraries in the plan area and the State Library of Western Australia
- Hard copies of the Draft FMP on display, and copies of draft plan available at DBCA Head Office in Kensington and DBCA regional offices in the Swan, South West, Warren and South Coast Regions
- Social media posts on the Parks and Wildlife Service Facebook, Twitter and YouTube channels during the public comment period ('boosted' and shared by social media advocates).

During the public consultation period, DBCA staff attended community events within the forest management plan area to provide an opportunity for community members to talk to the team about the draft plan and learn how to make a submission. Events were held in Manjimup, Busselton and Mundaring (see Table 1: Draft FMP regional pop-up event details).



**Table 1: Draft FMP regional pop-up event details**

Date	Time	Location
Saturday 29 October 2022	8:30am – 12:30pm	Manjimup Farmers Market Manjin Park, Mottram Street, Manjimup
Sunday 6 November 2022	7:00am – 12:30pm	Busselton Foreshore Markets Signal Park, Marine Terrace, Busselton
Saturday 19 November 2022	8:00am – 12:00pm	Mundaring Garden and Farmers' Market Sculpture Park, Mundaring

In addition to the communication and engagement activities outlined, the draft plan was supported by a range of supporting information on DBCA's website including frequently asked questions, 15 fact sheets, and pre-draft consultation reports.

All activities undertaken helped to facilitate wide-reaching coverage of the release of the Draft FMP and the associated public consultation period. The Draft FMP and consultation period received coverage in a range of media including television, radio, print and online. The department is aware that several community-based organisations ran their own campaigns to encourage submissions on the draft plan.

## Submission review

Submissions on the Draft FMP were invited through an online form (unique link), or by written submission via email or postal mail. During the public comment period, correspondence sent to the Minister for Environment about the draft plan was also regarded as a submission. To ensure a valid submission, submitters were required to provide their name, postcode and email address.

Each submission received was registered and submission comments were assessed against the review criteria stated in the Draft FMP and outlined below. For each submission received, information was recorded relating to the submitter's contact details and postcode, key topics or sentiments raised, and the review criteria applied. Once the data entry was complete for all submissions, invalid submissions were identified; these included duplicate submissions or those that had not provided a name, postcode and email address. Following the identification of any invalid submissions, data was generated on submissions and key topics raised.

## Submission review criteria

The following review criteria as outlined in the Draft FMP were utilised to assess submission comments. These criteria are based on the standard criteria developed and employed by DBCA when considering submissions on management plans.

**Category 1 comments;** The management plan **may be modified** if a submission:

- 1A provides additional information of direct relevance to management
- 1B indicates a change in (or clarifies) government legislation or management policy
- 1C proposes strategies that would better achieve management objectives
- 1D indicates omissions, inaccuracies or a lack of clarity.

**Category 2 comments;** The management plan **may not be modified** if a submission:

- 2A clearly supports proposals in the plan
- 2B makes general or neutral statements
- 2C refers to issues beyond the scope of the plan
- 2D refers to issues that are already noted within the plan or already considered during its preparation
- 2E is one among several widely divergent viewpoints received on the topic but the approach in the plan is still considered the best option
- 2F contributes options that are not feasible (generally due to conflict with legislation or government policy)
- 2G is based on unclear or factually incorrect information.

No subjective weighting was given to any submission for reasons of its origin or any other factor that would give cause to elevate the importance of any submission above another.

## Overview of submissions

### Submission type and origin

A total of 3517 submissions were received on the draft plan, comprising 345 unique submissions and 3172 proforma submissions. Signatories to an organisation's submission, or those submissions that utilised standard submission wording pre-prepared by an organisation, were considered as proforma submissions. Proforma submissions containing personalised comments were included in the tally of unique submissions, as well as the proforma submission tally.

The 345 unique (non-proforma) submissions comprised of 227 online forms, 116 submissions via email, and two via correspondence to the Minister for Environment. Submissions were received from individuals, industry groups and businesses, community-based organisations, local government and state government organisations as outlined in Table 2. A list of organisations and businesses which provided submissions on the draft plan is provided in Appendix B.

**Table 2: Number and origin of unique submissions**

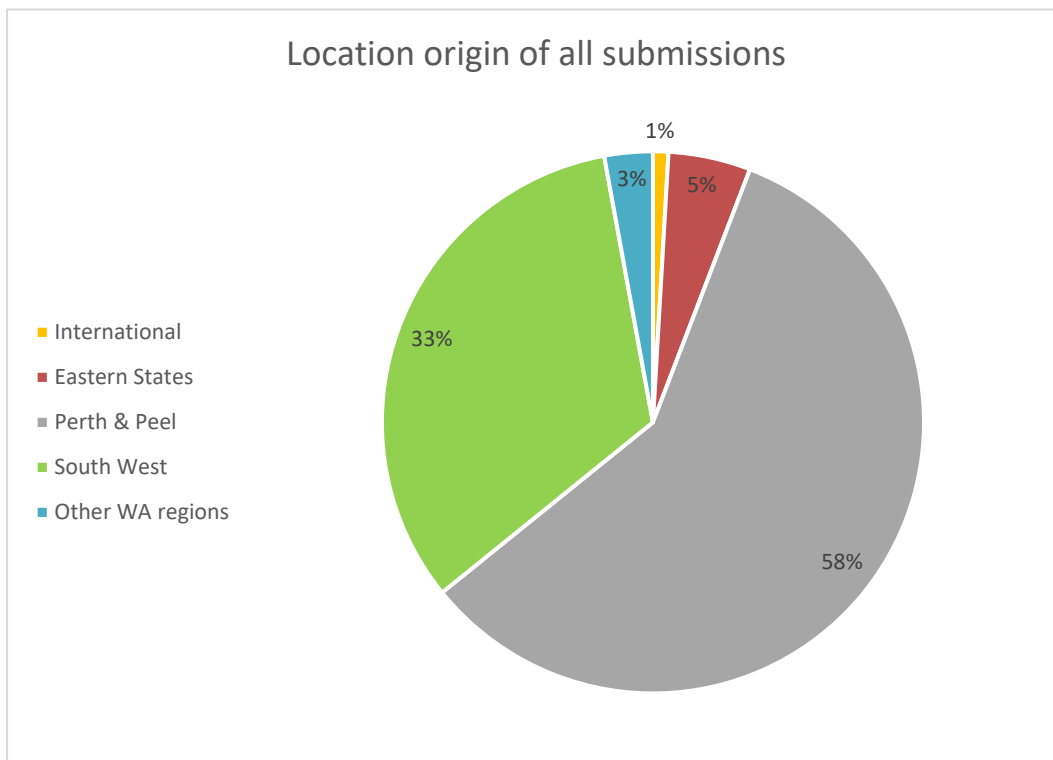
Source	Number
Individuals	261
Industry groups and businesses	25
Community-based organisations	47
Local government organisations	6
State government organisations	6

Proforma submissions were prepared and promoted by the WA Forest Alliance, Nannas for Native Forests, Bee Industry Council of Western Australia, Fire and Biodiversity WA, and Tourists and residents of the Dwellingup region (Table 3). At the request of DBCA, the majority of proforma submissions were compiled and submitted by the organisations arranging them as submission signatories. A small number of proforma submissions were received individually and subsequently identified as proforma submissions.

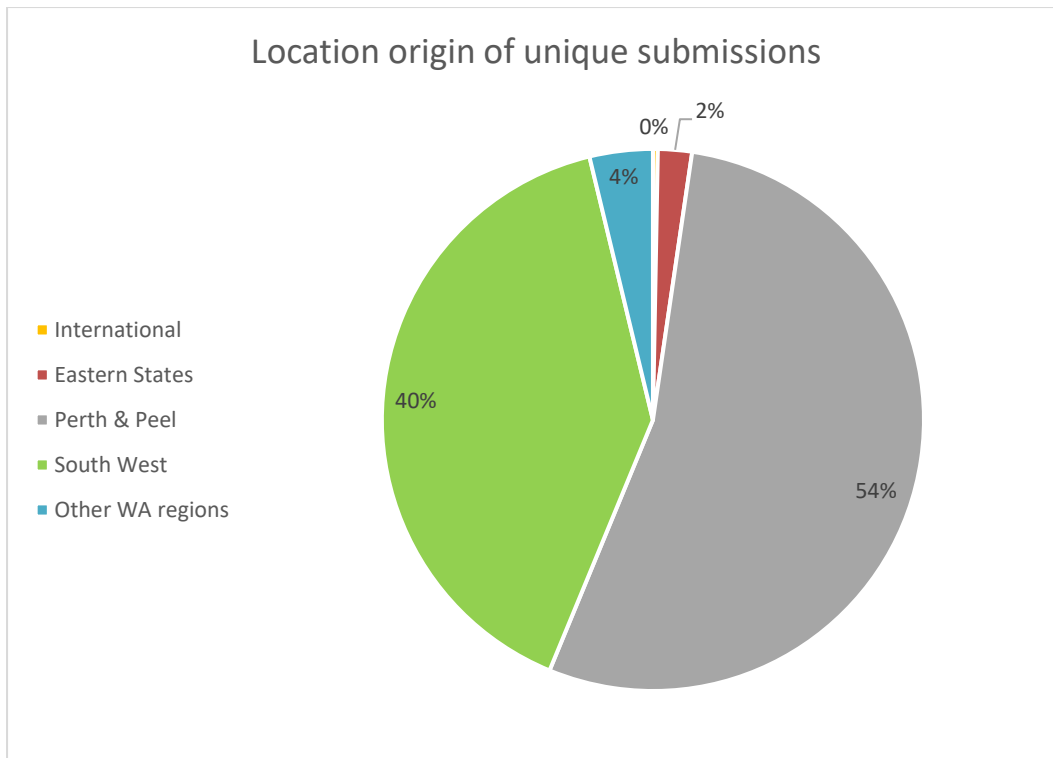
**Table 3: Origin of proforma submissions**

Proforma origin	Total
WA Forest Alliance - submission signatories	2244
Nannas for Native Forests - submission signatories	381
Bee Industry Council of Western Australia - submission signatories	176
Fire and Biodiversity WA - submission signatories	276
Fire and Biodiversity WA - proforma text	5
Tourists and residents of the Dwellingup region - proforma text	90
<b>TOTAL</b>	<b>3172</b>

Of the 3517 submissions received, most submitters were from Western Australia (91%). Many of these were from Perth and Peel (58%), followed by the south-west (33%), and a proportion from other WA regions (3%). A small number of submitters were from the eastern states of Australia (5%), or international locations (1%) (see Figure 1). Considering just the 345 unique submissions, a higher proportion of submissions were from Western Australia (94%), with 40% of unique submissions from the south-west (see Figure 2).



**Figure 1. Location origin of all submissions**



**Figure 2. Location origin of unique submissions**

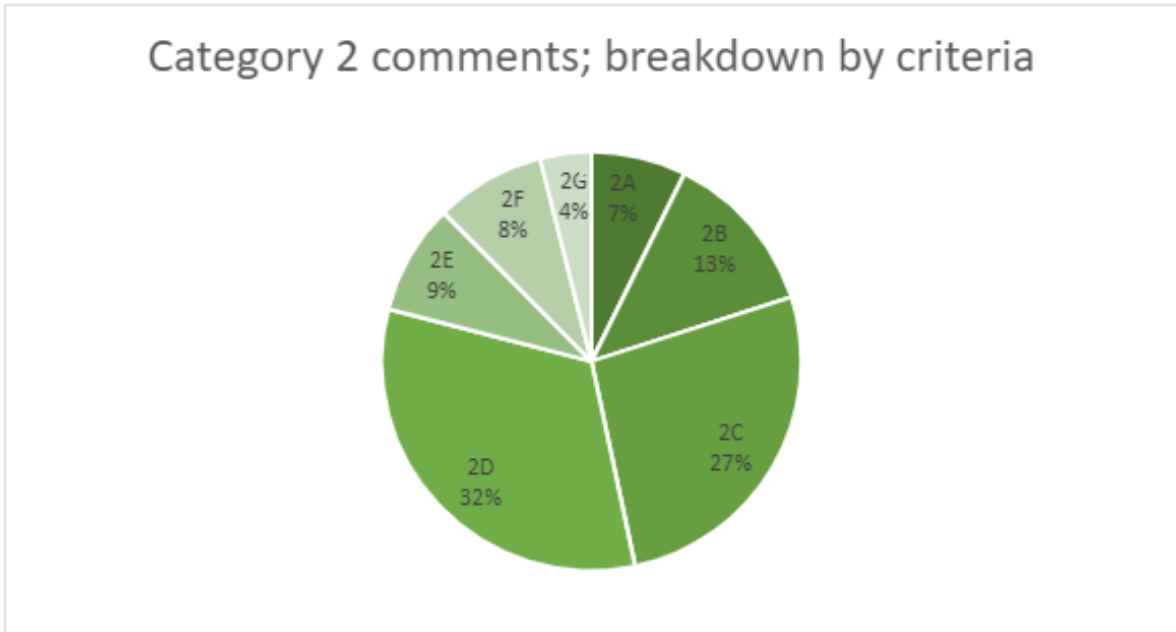
## Application of review criteria

From the submissions received, more than 3700 comments were identified and assigned review criteria. Applying the criteria, around 960 submission comments were initially identified as potential Category 1 comments; requiring further review to determine if modifications to the plan were warranted. Of the potential Category 1 comments initially identified, the vast majority were identified as 1D (indicating potential omissions, inaccuracies, or a lack of clarity). A small number of comments were identified as 1A (additional information of direct relevance to management), 1B (indicating a change or clarifying legislation or policy) or 1C comments (strategies that would better achieve management objectives).

A subsequent review of the approximately 960 potential Category 1 comments confirmed around 50% of these as being Category 1 comments, resulting in modifications to the plan, with the remainder reclassified as Category 2 comments, indicating no modification to the plan was required.

Of all Category 2 comments identified, the majority were identified as being 2D – already noted or considered (32%) or 2C – beyond the scope of the plan (27%). A smaller proportion of comments were considered 2B – general or neutral statements, 2E – among divergent viewpoints, 2F – options that are not feasible, 2A – supports proposals in the plan, or 2G – based on clear or factually incorrect information (see Figure 3).





**Figure 3. Breakdown of Category 2 comments by criteria**

## Summary of submission feedback

Submissions received addressed a broad range of topics and varied from detailed comments on specific sections of the plan, to requests for clarification on concepts and management, while others drew attention to inconsistencies or errors within the plan. All submissions were considered, however not all submission comments met the criteria necessary to result in amendments to the plan.

Comments identified as requiring further review to determine if modifications to the plan were necessary were considered by members of the forest management plan team, and where applicable, forwarded to subject matter experts within the department for consideration and feedback. Where amendments to the text was required, alternate wording was drafted.

This summary document outlines the feedback that resulted in key amendments to the plan (Category 1 comments), and broadly addresses key submission themes that were out of scope or already considered during the drafting of the plan (Category 2 comments).

## Changes to the plan in response to submission comments

Predominately, submissions contained multiple comments, hence many submissions were assigned multiple criteria. Due to the large volume of submissions received, this summary provides an overview of key topics raised and resultant changes to the FMP.

## Background

Submissions relating to the Background section of the Draft FMP commented on the development of the plan and approaches to forest management outlined in this section.

**Table 4: Key amendments to Background**

<b>Theme</b>	<b>Action/Response</b>
The plan lacks detail on the outcomes of the pre-draft public consultation process.	A paragraph providing detail on the outcomes of the pre-draft public engagement process and how these outcomes have been incorporated into the plan was added to 2.3 <i>Development of the plan</i> .
The plan provides no clear definition of forest health.	A revised definition of forest health was added to 2.4 <i>Approaches to forest management</i> , and to the glossary.

## Part A – Valuing our south-west forests

Generally, Part A of the plan was supported by submission comments.

*“The sentiments and research referred to in this section appear to be well considered and valid.”*

*“Agreed that the forests and woodlands of the south west are unique and important. They hold a range of environmental, cultural, social and economic values. Situated in a biodiversity hotspot, protecting and managing the forests to retain biological diversity and ecological integrity is critical for this management plan.”*

*“Part A demonstrates the uniqueness and exceptional value our state’s south-west forests represent and provide to the global and Australian communities and planetary ecosystems”.*

Several minor amendments were made to Part A in response to submissions calling attention to issues such as incorrect photo captions, simple omissions, or grammatical oversights.

Many comments requested more information on firewood which resulted in some amendments to the forest-based produce and resources text. Paragraphs or sections were re-drafted in response to detailed submissions requesting clarification or additional information on this section of the plan.

**Table 5: Key amendments to Part A**

<b>Theme</b>	<b>Action/response</b>
The plan requires more accurate use of terminology on geology of the FMP area.	Section 3.3.2 <i>Geology</i> was redrafted with text supplied by subject matter experts.
Text on groundwater is not reflective of groundwater access and use in the planning area.	Additional text supplied by subject matter experts added to section 3.3.3. <i>Hydrology</i> .
The plan does not acknowledge the importance of fungi for biodiversity.	Section 3.4.2 <i>Fungi</i> was added to the plan.
The definition of old-growth forest requires clarification.	Text added to 3.4.3 <i>Old-growth forest</i> (formerly 3.4.2 in the Draft FMP) to clarify the relationship to Regional Forest Agreement mapping criteria on which the definition of old-growth forest is based.

Theme	Action/response
<p>The plan does not adequately recognise:</p> <ul style="list-style-type: none"> <li>the contribution of the timber industry to the development of the south-west of Western Australia</li> <li>the historic management by the timber industry of State forests for native timber production</li> <li>the social heritage value of native West Australian hardwood products, and</li> <li>the social and economic value of the softwood timber industry.</li> </ul>	<p>Additional text was added to:</p> <ul style="list-style-type: none"> <li>section 3.5 <i>Other Australian heritage values</i></li> <li>section 3.6.1 <i>Forest-based produce and resources</i>, and</li> <li>the sub-heading <i>Plantations</i> in section 3.6.1.</li> </ul>
<p>The plan provides no guidance as to the status of the <a href="#">Djarlma Plan</a><sup>1</sup>.</p>	<p>Text on the Djarlma Plan and how it relates to the Forest Management Plan was added to 3.6.1 <i>Forest-based produce and resources</i>.</p>
<p>The plan does not adequately:</p> <ul style="list-style-type: none"> <li>recognise the economic value of the full suite of apiculture industry products</li> <li>acknowledge the reliance of the apiculture industry on forest health and reproductive maturity, and access to forests.</li> </ul>	<p>Additional text added to section 3.6.1 under the sub-heading <i>Apiculture and related products</i>.</p>
<p>Text on drinking water is not commensurate with the economic and social values of drinking water.</p>	<p>Additional text added to section 3.6.1 under the sub-heading <i>Public drinking water source areas (PDWSAs)</i>.</p>
<p>Text on recreation and tourism does not include specific acknowledgement of the importance of the proximity of the northern jarrah forest to the metropolitan area.</p>	<p>Additional text added to section 3.6.2 <i>Recreation and tourism</i>.</p>
<p>The plan does not provide detail on provision for amendments to tenure to meet land use planning commitments.</p>	<p>Section 3.6.4 <i>Land use planning</i> was added to the plan.</p>

## Part B – Pressures on our south-west forests

There was support for general principles in Part B of the Draft FMP.

*“Good to see recognition of the role that forests play in carbon storage, and acknowledgement of the need to manage use, activities, weeds / feral animals / diseases that impact forest health”.*

Submissions requesting changes in Part B centred on pressures on south-west forests such as mining, unplanned and planned fire, and climate change. Minor edits were made to Part B in response to submissions calling attention to omissions or oversights in the text. A large number of submissions voiced concerns that the impacts of minerals and resource development on the biodiversity of native forests, particularly the northern jarrah forest, were not adequately addressed in the plan. Comments included concerns regarding the scale of vegetation clearing, potential for successful rehabilitation of cleared areas, and rehabilitation post-mining.

<sup>1</sup> Djarlma Plan [www.wa.gov.au/system/files/2020-08/Djarlma-Plan.pdf](http://www.wa.gov.au/system/files/2020-08/Djarlma-Plan.pdf)

Some comments requested protection of key areas of native forests in the reserve system. These comments are discussed under [Part C: Maintaining and expanding the reserve system](#). Other submissions called to end mining in native forests. These comments did not meet Category 1 criteria and are discussed under the heading [Submission comments that did not result in changes to the plan](#).

A significant number of submissions commented on prescribed burning fire regimes. As prescribed burning processes are not discussed in this section, these comments are addressed in [Part C: Fire management](#).

**Table 6: Key amendments to Part B**

Theme	Action/Response
<p>The plan does not provide detail on the:</p> <ul style="list-style-type: none"> <li>impacts of mining development in terms of establishing adequate rehabilitation, in particular following mining of bauxite, and</li> <li>extent of clearing for mineral resource development.</li> </ul>	<p>Changes were made to section 4.2 <i>Minerals and resource development</i> to add further detail and clarify existing text.</p> <p>A new appendix was added to outline processes for consent to undertake mineral, petroleum and geothermal resources activities in State forests and other CALM Act reserves.</p>
<p>The plan does not provide enough detail on forest recovery after high intensity fires.</p>	<p>Detail was added to section 4.3 <i>Inappropriate fire regimes</i>.</p>
<p>The plan does not acknowledge feral goats and horses as a threat to south-west forests.</p>	<p>Detail on the detrimental impact of feral goats and horses in the Warren region was included in section 4.5.1 <i>Pest vertebrates</i>.</p>
<p>The plan does not acknowledge the prevalence of unauthorised activities in forests close to the metropolitan area.</p>	<p>Section 4.7 <i>Unauthorised activities</i> was amended to include a paragraph on the increased pressure of unauthorised activity in national parks, reserves and forest areas close to Perth.</p>

## Part C – Managing our south-west forests

A high proportion of submissions addressed management objectives and activities outlined in Part C of the Draft FMP. Several submissions requested clarity on the roles of forest management agencies and groups. Acknowledgement of the responsibilities of multiple agencies, land managers and forest supporters in contributing to effective management in collaboration with the department was added to section 5.2 *Management context*.

Minor edits were made in Part C in response to submissions requesting that management activities in this section were linked to corresponding information in *Part B - Pressures on our south-west forests*.

### Foundation 1: Noongar cultural heritage and management partnerships

Many submissions expressed strong support for valuing Noongar cultural heritage, Noongar management partnerships and the incorporation of traditional knowledge into forest management practices such as fire and weed management.

*“Yes, I congratulate the plan on including this - it's very important to have Noongar elders at the consulting table when making decisions about the SW Forest area.”*

In response to submissions requesting more clarity in the wording, several minor edits to the text were made to section 5.3.2 *Protection of Noongar cultural heritage* and *Table 3: Summary of management directions for Noongar cultural heritage and management partnerships*. More comprehensive edits were made in this section in response to detailed submissions requesting further information on Noongar partnerships.

**Table 7: Key amendments to Foundation 1**

Theme	Action/Response
Text around cooperative and joint management does not adequately address the potential for partnerships and Noongar involvement in on-ground forest management.	Text added to section 5.3.1 <i>Cooperative and joint management</i> to provide detail on the operation of Cooperative Management Agreements.
Joint-vesting of land with traditional owners is not recognised in the plan.	Text added to section 5.3.1 <i>Cooperative and joint management</i> to clarify provision for joint-vesting of CALM Act land.

## Foundation 2: Biodiversity conservation

Submissions on this section of the Draft FMP supported the need to manage the south-west forests for biodiversity.

### Maintaining and expanding the conservation reserve system

Generally, submissions expressed support for conservation of biodiversity through the maintenance and expansion of the reserve system across the planning area and were supportive of the addition of at least 400,000 hectares of native forests to the reserve system.

*“The commitment to securing the formal protection of a minimum of 400,000 ha of new protected areas and formalising the secure protection of the 320,000 hectares already proposed for conservation is strongly supported.”*

While supporting the protection of forests in reserves, a considerable number of submissions provided detailed feedback voicing concerns on the timeline and process for the creation of reserves. Many comments specifically focussed on the lack of representation of proposed new reserves in the northern jarrah forest, and requested biodiverse sections of the northern jarrah forest be incorporated into the reserve system as soon as possible to provide these areas with protection from mining. Some submissions raised that areas identified for inclusion in the reserve system in previous plans have yet to be formalised and questioned the ability for these, as well as and the proposed 400,000 hectares of new areas, to be included in conservation estate within the timeframe of the FMP 2024-2033.

In response, this section of the plan was redrafted for clarification and further explanation. Appendices were added to clarify the relationship of mining approval processes to the CALM Act and the FMP area, and to provide information on priorities and processes for identifying areas to be incorporated into the conservation reserve system.

**Table 8: Key amendments to Maintaining and expanding the conservation reserve system**

Theme	Action/response
<p>The plan does not include information on completing the reservation of the 320,360 hectares of land identified in previous FMPs.</p>	<p>Text modified in section 5.4.1 <i>Maintaining and expanding the conservation reserve system</i> to show maintaining and expanding the conservation reserve system through implementing the commitments identified in previous FMPs is a priority of the FMP 2024-2033.</p>
<p>The FMP requires:</p> <ul style="list-style-type: none"> <li>• more detail on how reserve creation will be progressed</li> <li>• clarification on the selection criteria, scope, and operation of proposed Disturbance Avoidance Zones</li> <li>• detail on the relationship between proposed reserves and ecological thinning candidate areas, and</li> <li>• increased protection of the northern jarrah forest.</li> </ul>	<p>Section 5.4.1 <i>Maintaining and expanding the conservation reserve system</i> was redrafted to provide clarification, including consultation with relevant agencies, or additional information.</p> <p><i>Table 5: Summary of management directions for maintaining and expanding the reserve system</i> was modified to include creating protected areas in the northern jarrah forest to meet Comprehensive, Adequate and Representative reserve system targets, and consideration of future uses of indicative areas for increased protection when advising on proposed activities or disturbances in these areas..</p> <p>Map 13 was updated to priority area for investigation for inclusion into the conservation reserve system.</p> <p>Appendix 1 was modified for clarity.</p> <p>A new appendix was added to outline processes for consent to undertake mineral, petroleum and geothermal resources activities in State forests and other CALM Act reserves.</p> <p>A new appendix describing priorities and processes for identifying and creating an additional 400,000ha of conservation reserves was added.</p>

## Conserving biodiversity

Submissions requested assurance forests would be managed for enhancement of biodiversity. Minor edits to *Table 6: Summary of management directions for conserving biodiversity* were made in response.

## Managing permitted disturbance activities

A number of submissions addressed mining in this section of the Draft FMP. Although mining activities are subject to legislation and agreements that override the CALM Act, and are therefore beyond the scope of the FMP, changes were made to clarify the parties responsible for approving and regulating the mining industry. An appendix clarifying the relationship of the CALM Act to State Agreements and mining, and mineral, petroleum and geothermal legislation was added to the plan to further address these comments.



**Table 9: Key amendments to Managing permitted disturbance activities**

Theme	Action/Response
<p>The plan:</p> <ul style="list-style-type: none"> <li>• does not outline the role of the department in relation to industry in the planning area</li> <li>• does not provide clarity on parties responsible for approving and regulating the mining industry</li> <li>• requires more guidance to assist the mining industry in planning operational activities, and</li> <li>• requires clearer information on reporting of land disturbances on CALM Act land.</li> </ul>	<ul style="list-style-type: none"> <li>• Text was added to section 5.4.3 <i>Managing permitted disturbances</i></li> <li>• Multiple additions and alterations were made to text in Table 7: <i>Summary of management directions for managing permitted disturbances</i>.</li> <li>• A new appendix was added to outline processes for consent to undertake mineral, petroleum and geothermal resources activities in State forests and other CALM Act reserves.</li> </ul>

### Foundation 3 – Forest health and climate resilience

Submissions generally recognised climate change as a threat to the health and biodiversity of the south-west forests and supported forest management to mitigate the effect of climate change on the forests.

*“...recognition in the draft plan that our forests need to be managed with due consideration of a “dry” and “drying” climate is important and supported.”*

#### Climate mitigation: carbon storage

A substantial number of submissions queried information provided in section 5.5.1 *Climate mitigation: carbon storage*. In response this section was re-drafted to provide clarity.

**Table 10: Key amendments to Climate mitigation: carbon storage**

Theme	Action/Response
<p>The plan:</p> <ul style="list-style-type: none"> <li>• requires clarity on the linkage between fire and carbon storage</li> <li>• requires quantitative information on carbon storage</li> <li>• requires detail on how recovery of carbon stores will be promoted following disturbance events</li> <li>• does not acknowledge that the capacity for mature forests to store carbon is reduced.</li> <li>• requires clarification on ecological thinning and carbon storage objectives.</li> </ul>	<p>Section 5.5.1 <i>Climate mitigation: carbon storage</i> was redrafted to address these points.</p> <p>Edits were made to <i>Table 9: Summary of management directions for climate mitigation – carbon storage</i>.</p>

## Climate adaptation: active forest management and ecological thinning

Support was strong for active forest management to mitigate the effects of climate change, although many submissions requested more detailed information on these management activities, especially with respect to ecological thinning. Some submissions requested clarification on ecological thinning strategies for forest health, while others approached ecological thinning from a forest industry perspective noting industry uncertainty as harvest volumes are not specified in the plan. The latter comments do not meet Category 1 criteria and are discussed under the heading [Submission comments that did not result in changes to the plan.](#)

**Table 11: Key amendments to Climate adaptation: active forest management and ecological thinning**

Theme	Action/Response
The plan requires detail on priorities for selecting candidate areas.	Text was added to section 5.5.2 under the sub-heading <i>Candidate areas</i> . An appendix was added to provide information on the process for the preparation of silvicultural guidelines for ecological thinning.
The plan does not adequately acknowledge that ecological thinning should extend beyond regrowth to forest stands of all ages.	Text was added to section 5.5.2 under the sub-heading <i>Candidate areas</i> .
The plan requires more detail on ecological thinning in mining rehabilitation areas.	Text was added to section 5.5.2 under the sub-heading <i>Mining rehabilitation</i> .
The plan requires detail on the scale of ecological thinning.	Text was added to section 5.5.2 under the sub-heading <i>Overall scale of ecological thinning operations</i> .
The plan requires detail on the proposed operational trials and the scheduling of ecological thinning.	Text was added to section 5.5.2 under the sub-headings <i>Other vulnerable areas</i> and <i>Overall scale and timing of ecological thinning operations</i> to clarify the role of operational trials and that ecological thinning operations need to commence independently of trials due to the imperative to undertake climate adaptation measures from the commencement of the FMP.
The plan does not clarify which agency will select candidate ecological thinning areas.	Text amended for clarification in <i>Table 14: Summary of management directions for climate adaptation – ecological thinning</i> A new appendix outlining the process for the preparation of silvicultural guidelines for ecological thinning was added.

## Climate Science

Many submissions lobbied that maintaining a profitable, sustainable forestry industry will actively reduce carbon emissions, and that transport of timber from other areas to meet demand will add to the production of carbon dioxide. These comments were categorised as out of scope of the plan. For discussion on these comments refer to [Submission comments that did not result in changes to the plan.](#)

In addition, many submissions referring to this section of the plan supported incorporating increased areas into the reserve system to better protect the forests from the threat of climate change.

*“This draft FMP represents a major departure from previous FMPs in regards to its recognition of the value that protected forests can provide in the fight against climate change. This FMP rightly understands that forests are critical to making our local communities in the South West more climate resilient.”*

Other submissions supported climate science research as integral to underpinning forest management activities.

More detail was added to *Table 15: Summary of management directions for climate science* to address submissions asking for acknowledgement of climate change feedbacks and the effect of these feedback processes in association with other pressures affecting forest health in amplifying or reducing the effects of climate change.

## Fire management

A significant number of submissions provided comment on fire management. Many voiced concerns regarding forest fire management practices, including the current prescribed burn program. The department’s fire management framework is endorsed and implemented as Government policy. Text was added to section 5.5.4 *Fire management* to explain the need for landscape scale risk reduction in addition to managing fuel levels in buffers around towns and infrastructure. Reference to DBCA being the lead agency to implement the Enhanced Prescribed Burning Program in the Western Australian Climate Policy, 2020 (Department of Water and Environmental Regulation 2020) was added in response to comments querying how landscape scale burns aligned with the DBCA burning priorities of protecting life and infrastructure. Minor modifications were made to the text in this section, in response to submissions calling attention to new research relevant to fire science.

For further discussion on comments relating to fire management refer to [Submission comments that did not result in changes to the plan.](#)

## Weeds

Submissions recognised weeds as a significant threat to the forests and voiced strong support for effective weed management. Some submissions requested emphasis on weed eradication and weed management following disturbances (including fire) be identified as a management activity to protect biodiversity. Minor edits were made in text and in *Table 17: Summary of management directions for weeds.*

## Pest animals

Submissions on this section generally supported pest animal management directions and activities in the south-west forests.

*“The continuation of the Western Shield program and the increase in focus on feral pigs are both very welcome. There is clear evidence of increasing feral pig activity in the Julimar Forest and other forests and conservation parks in the Swan Region.”*

Key points and considerations, and management objectives were updated in *Table 18: Summary of management directions for pest animals* to align with the recognition of feral goats and horses as pressures on the forest in additional text added to section 4.5 of the plan.

## Diseases

Submissions voiced concern over the threat posed by the spread of *Phytophthora cinnamomi* (Phytophthora dieback) calling for more detail on management activities and suggested public education be implemented as a management activity to combat unintentional community spread of the disease. Minor edits were applied to text in this section in response to these comments.

## Soil and water

Submissions on this section voiced concerns over the impacts of mineral and resource development and other disturbance activities on soil and water quality, and therefore biodiversity. As mining activities are not regulated under the CALM Act, these comments were considered out of scope.

The Department of Water and Environmental Regulation (DWER) and Water Corporation provided detailed comment on this section. Additional text recognising the economic and social values of drinking water was added to section 3.6.1 *Forest-based resources* under the sub-heading *Public drinking water source areas (PDWSAs)*.

Text was also added to section 5.5.8 *Soil and Water* to note the collaborative work the department undertakes with other agencies, land managers and proponents to manage and monitor activities that may be detrimental to soil and water quality.

## Regeneration and rehabilitation

Submission comments referring to this section called attention to the lack of management objectives addressing the importance of regeneration and rehabilitation of cleared pine plantations as habitat and food source for Carnaby's black cockatoos (*Zanda latirostris*). Some submissions included detailed comments on the management of Carnaby's black cockatoos. Specific management of Carnaby's black cockatoos does not fall within the scope of the FMP. Rehabilitation of cleared areas of pine plantations to provide environmental benefits, including food resources for Carnaby's black cockatoos, is addressed in the plan.

**Table 12: Key amendments to Regeneration and rehabilitation.**

Theme	Action/Response
The plan does not provide adequate information on challenges associated with ethical and sustainable sourcing and supply of native seed.	Text added to section 5.5.9 <i>Regeneration and rehabilitation</i> to acknowledge logistical challenges in meeting demand for seed collection.
The plan lacks information on collaboration with other agencies or land managers.	Text added to section 5.5.9 <i>Regeneration and rehabilitation</i> .
The plan does not acknowledge that rehabilitation cannot return a cleared landscape to pre-clearing ecosystems composition and function.	Wording amended in section 5.5.9 <i>Regeneration and rehabilitation</i> clarify that regeneration and rehabilitation differ from restoration in that they do not usually restore full species and ecosystem function to cleared areas.

## Unauthorised activities

Generally submissions on this section of the plan called for effective management of unauthorised activities. Key points and considerations in *Table 22: Summary of management directions for unauthorised activities* were amended to clarify management directions addressed in the plan. Some submissions pointed to illegal taking of firewood for private and commercial purposes, this issue is addressed under Foundation 4, *5.6.3 Forest-based resources*.

## Foundation 4: Social and economic benefits and opportunities

Submissions on this section generally acknowledged the importance of social and economic benefits but called for sustainable management of activities to protect biodiversity.

*“The more popular an area, the more potential there is for visitors to have negative impacts on the biodiversity and the natural environment. So planning for recreation and tourism needs to ensure that impacts are minimized.”*

Amendments to text in this section were made in response to submissions requesting information on authorised access to south-west forests for off road vehicles.

**Table 13: Key amendments to Nature based tourism and recreation**

Theme	Action/Response
The plan requires detail on: <ul style="list-style-type: none"><li>• access to areas for designated recreational use such as off-road vehicle trails, and</li><li>• management of the impact of authorised and unauthorised impacts of off-road vehicle use of the forests.</li></ul>	<ul style="list-style-type: none"><li>• Text was added to section <i>5.6.1 Nature based-tourism and recreation</i>.</li></ul>

## Forest-based resources

Category 1 comments referring to this section of the Draft FMP centered on the apiary industry and firewood, with some references to basic raw material extraction. Some submissions voiced concerns over a potential escalation of illegal take of firewood as a consequence of the decision to end large-scale commercial harvesting in native forests. The plan addresses the availability of firewood in *5.6.3 Forest-based resources* and will manage the unauthorised take of firewood using strategies outlined in *5.5.10 Unauthorised activities*.

**Table 14: Key amendments to Forest-based resources**

<b>Issue</b>	<b>Action/Response</b>
The plan does not provide information on availability of native timber for craftwood.	Text was added to section 5.6.3 under the sub-heading <i>Native forests</i> .
The plan requires more clarity on the enforcement strategies and behaviour change initiatives, with the aim of reducing firewood consumption.	Text clarifying the intent and scope of the Firewood Management Strategy as addressing unauthorised firewood collection was added to section 5.6.3 under the sub-heading <i>Public firewood areas</i> .
The plan does not accurately address feral bees in the management of apiculture and related products.	Text was added to section 5.6.3 under the sub-heading <i>Apiculture and related products</i> .
The plan requires clarification on the approval process for proposals to extract basic raw materials (BRM).	Text was added to section 5.6.3 under the sub-heading <i>Basic Raw Materials (BRM)</i> .

## Access

Submissions on this section of the Draft FMP noted a lack of acknowledged provisions for change of land use identified from strategic land use planning processes. In response, text under a new heading *Land use changes* was added to section 5.6.4 *Access*. Additional text on excision of land to which the plan applies was also added to *Table 28: Summary of management directions for access*.

## Stakeholder and community engagement

There was strong support for this section of the Draft FMP.

*“We support this approach. Volunteers are essential, so are education and stakeholder engagement”*

A minor amendment to text in this section was made in response to submissions calling for increased provision for engagement and sharing of knowledge relating to active management and adaptive management directions between stakeholders, community groups, industry, tourism and recreation operators, and scientific experts. Submitters also asked to be noted as stakeholders for different consultation processes.

## Part D – Plan implementation, assessment and adaptive management

A substantial number of submissions requested assurance of adequate resourcing for the implementation of the plan. Around half of these comments referred to funding for all management activities. Others referred specifically to funding of:

- fire suppression and mitigation
- Noongar on-ground management activities, including prescribed burning
- adaptive management
- weed control, and
- control of unauthorised activities such as illegal taking of firewood and off-road vehicle activity in the forest.



Detailing resourcing for the implementation of the FMP is out of scope for the plan itself. Resourcing for plan implementation is a separate process to be decided by Government. Resources are allocated according to government priorities and may change over the 10 year timeframe of the plan.

Several submissions requested more specific and measurable key performance indicators (KPIs). The KPIs presented in the plan reflect high level priorities and the development of further indicators is resource dependent and will occur as part of implementation planning.

Some submissions requested greater frequency of periodic assessments. Due to the scale, complexity, resource dependence and time required for adequate trend data to be acquired, periodic assessments will remain at years 5 and 10.

Other submissions requested more detail on implementation, management effectiveness, and the review process including stakeholder engagement in periodic assessments.

**Table 15: Key amendments to Part D**

<b>Theme</b>	<b>Action/Response</b>
The plan does not provide opportunity for partnerships with stakeholders in the implementation of the plan.	Text was added to <i>6.2.1 Forest Management System</i> to acknowledge this provision.
The plan lacks detail on the implementation plan.	Detail was added to <i>6.2.1 Forest Management System</i> to provide information on the timeframe and scope of the implementation plan.
The plan does not recognise the value of building on existing research or acknowledge that research should be integrated to consider ecological interactions.	Additional text addressing these themes was added to section <i>6.2.3 Research</i> .
The plan does not acknowledge public and stakeholder involvement in the review process.	Text was added to section <i>6.3.2 Periodic assessments</i> .
The plan should allow for internal and external stakeholders to be involved in and informed about periodic assessments.	Text was added to <i>6.3.2 Periodic assessments</i> .
The plan does not provide adequate information regarding timeframes and reporting processes for evaluating management effectiveness.	Text amended in section <i>6.3.3 Management effectiveness evaluations</i> .

## Maps

Corrections to maps were made in response to submission comments drawing attention to minor errors and omissions. Map 13 was re-drafted to provide further detail on priority areas for reserve creation. High-resolution maps will be available with the online version of the plan.

## Appendices

Appendix 1 was modified in response to comments calling for more clarity on the extent of land categories within the planning area.

**Table 16: Modifications to Appendix 1**

<b>Appendix in Draft FMP</b>	<b>Modification</b>	<b>Appendix in FMP</b>
Appendix 1a and 1b	Appendices 1a <i>Land categories</i> and 1b <i>Areas of land categories covered by the plan (as of June 2021)</i> were combined.	Appendix 1a <i>Land categories by extent within the planning area (as of June 2022)</i> .
Appendix 1c	Re-named	Appendix 1b <i>Areas of forested lands vested in the Commission</i> .
<i>Appendix 1d Disturbance Avoidance Zones in State forest and timber reserves</i>	Updated to include information on Munda Biddi Trail travel route zones and re-named.	<i>Appendix 1c Disturbance Avoidance Zones in State forest and timber reserves</i> .

Three new appendices were added to further clarify text added in response to requests for more information and detail on key themes identified in submission comments.

**Table 17: Additional appendices**

<b>Appendix</b>	<b>Purpose</b>
<i>Appendix 6 Processes for consent to undertake mineral, petroleum and geothermal resource activities in State forests and other CALM Act reserves.</i>	To clarify processes for mineral and resource projects and clarify the scope and operation of the CALM Act.
<i>Appendix 9 New reserve design and creation – priority areas of State forest for investigation.</i>	To describe priorities and processes for identifying and creating the additional 400,000 hectares of conservation reserves.
<i>Appendix 10 Process for preparation of silvicultural guidelines for ecological thinning.</i>	To describe processes for developing and refining ecological thinning guidelines and prescriptions.

## Submission comments that did not result in changes to the plan

Many submission comments did not meet the criteria necessary to be considered for changes to the plan. Of these, a number were noted for response through complementary resources such as a fact sheet or webpage. These resources will be published on the [Forest Management Plan page](#)<sup>2</sup>

A large volume of submissions called for all mining in the south-west forests to cease. Some of these comments also called for areas of the forest, particularly the northern jarrah forest, to be incorporated into reserves specifically with an objective of preventing mining. Inclusion of areas of forest into conservation reserves does not in itself preclude mining, with mining in reserves able to continue under relevant mining legislation. DBCA has noted that public education on this issue is warranted.

<sup>2</sup> [www.dbca.wa.gov.au/forest-management-plan](http://www.dbca.wa.gov.au/forest-management-plan)

A considerable number of comments called for changes in prescribed burn management activities. These activities are undertaken in line with legislation and government-endorsed fire management policy. This policy extends beyond the Forest Management Plan area, and as such, submission requests for changes to prescribed burning activities in the south-west forests did not result in changes to the plan.

Many comments requested linking rehabilitated land to encourage species movement and resilience; and clarification on the scope of regeneration/rehabilitation of cleared land. The FMP allows for rehabilitation but details on specific rehabilitation management programs is beyond the scope of the plan.

Many submission comments referring to Part D of the draft plan requested more defined, measurable KPIs. Implementation of the plan is resource dependent, and may vary over the life of the plan. KPIs therefore reflect priority management directions and activities.

Submissions from some industry bodies requested specific harvest volumes be included in the plan. Timber production on a sustained yield basis will no longer be primary purpose of ecological thinning is to promote forest health and resilience in order to protect biodiversity. It is therefore beyond the scope of the plan to specify wood product volumes for commercial purposes.

Many submission comments addressed similar themes, and due to the large volume of comments received, an overview of how the Category 2 assessment was applied to these themes is provided below.

**Table 18: Allocation of [Category 2 criteria](#) for key themes**

Theme	Reason for allocation of criteria
The plan does not recognise the importance of honeybees to pollination and increased yield in agricultural crops.	2C - Forest Management Plans do not extend to management of agricultural crops.
Mining should cease in native forests managed under the CALM Act.	2C – mining activities are subject to legislation and agreements that override the CALM Act.
Resources and funding should be sufficient for timely and effective implementation of the plan.	2C – Resourcing is a separate process to be decided by Government.
The plan does not provide clear, defined, measurable KPIs.	2C – Defining performance measurements and management targets will occur through subsequent implementation planning.
Processes for co-management and vesting of new reserves with traditional owners should be set out in the plan.	2C – out of scope for the plan itself but will be considered as part of the reserve design and creation process.
Sustainable logging of the south-west forests should continue.	2C – the plan is a mechanism to implement government policy, therefore reinstating large scale commercial harvesting of native forests is beyond the scope of the plan.
Fire management should include Noongar traditional owners.	2D – engagement with Noongar traditional owners in fire management is considered in the plan.
Access to firewood is necessary.	2D – the plan outlines provisions for the availability of firewood.
Illegal take of firewood will increase when the ban on harvesting native forests is implemented.	2D – the plan outlines management of unauthorised activities, including illegal take of firewood.

Theme	Reason for allocation of criteria
Ecological thinning should focus on forest restoration and forest health.	2D – the objective of ecological thinning is to improve or maintain ecological value.
The plan should contain mapped detail of river and catchment boundaries and aquifers within the FMP area.	2D – a hydrological map was considered too detailed for the format of the plan.
The ability to overlay maps in the online version of the plan to highlight areas at most risk from pressures would be beneficial.	2F – not feasible due to technical issues and cost of production.
Conservation of biodiversity should be the first priority for prescribed burning.	2F – sections 33 (1)(a) and 33(3) of the CALM Act provides for the department to manage lands to which this Act applies. Section 33(1)(aa) provides for planned burning for the purpose of preventing, managing or controlling fire on CALM Act managed lands..
Abandon the prescribed burn target.	2F –prescribed burning is recognised by the State government as necessary for effective land management and mitigation of bushfire risk, in accordance with the department’s statutory responsibilities.
Clear-felling of native forests for mining, residential or commercial development should be banned.	2F – the plan does not regulate the clearing of native vegetation. Mining activities are subject to legislation and agreements that override the CALM Act. Residential and commercial development are not proposed in the plan.
The plan does not adequately address rehabilitation of cleared pine plantations to provide resources for Carnaby’s black cockatoos.	2D – the plan provides for rehabilitation of cleared pines for environmental benefits, including food sources for Carnaby’s black cockatoos.

Many comments did not request changes or refer to issues in the plan. These comments were categorised as 2B. Fewer comments expressed views divergent to management directions considered more appropriate for effective outcomes or were based on verified factually incorrect information. These comments were categorised as 2E or 2G respectively.

## References

Martin, D., J. (2022) Defining and Creating New Protected Areas in South West Forests Beyond 2024. The Beeliar Group and The Leeuwin Group. Perth.

Department of Water and Environmental Regulation, (2020). Western Australian Climate Policy – ‘A Plan to position Western Australia for a prosperous and low-carbon future’ <https://www.wa.gov.au/service/environment/environment-information-services/western-australian-climate-change-policy> Government of Western Australia. Perth, Western Australia.

## Appendix A Print advertising schedule

Timeframe	Method	Publication
<b>Week 1</b> W/C Sun 16 October	Quarter page ad (colour)	West Australian Walpole Weekly Bunbury Mail Augusta Margaret River Mail Busselton Dunsborough Mail Collie River Valley Bulletin
<b>Week 2</b> W/C Sun 23 October	Quarter page ad (colour)	Denmark Bulletin (fortnightly paper)
	A4 double-sided colour insert (total 74,830)	Albany Advertiser Albany Extra Augusta Margaret River Times Bunbury Herald South Western Times Busselton Dunsborough Times Great Southern Herald Harvey Waroona Reporter Manjimup Bridgetown Times Narrogin Observer
<b>Week 5</b> W/C Sun 13 November	Quarter page ad (colour)	West Australian Walpole Weekly Bunbury Mail Augusta Margaret River Mail Busselton Dunsborough Mail Collie River Valley Bulletin
	A4 double-sided colour insert (total 74,830)	Albany Advertiser Albany Extra Augusta Margaret River Times Bunbury Herald South Western Times Busselton Dunsborough Times Great Southern Herald Harvey Waroona Reporter Manjimup Bridgetown Times Narrogin Observer
<b>Week 6</b> W/C Sun 20 November	Quarter page ad (colour)	Denmark Bulletin (fortnightly paper)

# Appendix B – List of organisations which made a submission on the Draft Forest Management Plan 2024-2033

## Community-based and catchment

Australian Recreational Motorists Association  
Bibbulmun Track Foundation  
Birdlife Australia  
Bridgetown-Greenbushes Friends of the Forest + Friends of the Earth W.A.  
Bunbury Geographe Economic Alliance (BGEA)  
Community Reference Panel on Forest Thinning for Ecological Health  
Conservation Council of WA Inc  
Conserving the Avon River Environment Inc.  
Dwellingup Discovery Forest Defenders  
Dwellingup Protection Group Sub Committee  
Fire and Biodiversity WA  
Fire for Life  
Forest Collective  
Gondwana Link  
HikeWest Inc  
Jarrahdale Forest Protectors  
Julimar Conservation and Forest Alliance  
Lower Helena Association  
Mersea Forest Survey Team (MFST)  
Murdoch University - Black Cockatoo Conservation Management Project  
Nannas for Native Forests  
Nature Reserves Preservation Group of Kalamunda  
Peel Alliance  
Peel-Harvey Catchment Council  
Perth Bush Walkers  
Perth Bushwalkers Club (inc)  
Perth NRM  
Preston Environment Group  
Promote Preston  
Quinns Rocks Environmental Group  
Recreational Trailbike Riders' Association of WA Inc  
Save Perth Hills  
South West Catchments Council  
South-West Forests Defence Foundation Inc.  
The Bushfire Front Inc.  
The Leeuwin Group  
The Wilderness Society WA  
Toodyay Friends of the River



Toodyay Historical Society Inc.  
Toodyay Naturalists' Club Inc.  
Tourists and residents of the Dwellingup region  
Urban Bushland Council WA  
WA Forest Alliance (WAFA)  
West Australian Dingo Association Inc.  
Western Australian Naturalists' Club Inc  
Western Australian Water Users' Coalition Inc.  
Woodturners Association of WA (Inc)

## Industry groups and businesses

Alcoa  
Australian Home Heating Association (AHHA)  
The Australian Workers' Union (AWU), West Australian Branch  
Bee Industry Council of Western Australia (BICWA)  
Chalice Mining Limited  
Endurowetech Suspension  
Environment Institute of Australia and New Zealand (EIANZ)  
Forest Industries Federation (WA) Inc. (FIFWA)  
Forestry Australia  
Giovanetti Firewood  
Jarrimber Furniture  
Karrakup Enterprises  
Pemberton Discovery Tours  
Pemberton Hiking and Canoeing  
Redmond Sawmill Albany W.A.  
Rockbridge Holdings Pty Ltd  
South32 Limited  
T.J Depiazzi and sons  
Talisson Lithium Pty Ltd  
Tauss and Associates Biodiversity Consultants  
WA Furniture Manufacturers' Association (WAFMA)  
WAPRES (WA Plantation Resources)  
Wespine Industries Pty Ltd  
Whiteland Milling

## Local government

Shire of Bridgetown-Greenbushes  
Shire of Manjimup  
Shire of Mundaring  
Shire of Murray  
Shire of Nannup  
Shire of Serpentine Jarrahdale

## State government

Department of Fire and Emergency Services (DFES)  
Department of Mines, Industry Regulation and Safety (DMIRS)  
Department of Water and Environmental Regulation (DWER)  
Synergy  
Water Corporation  
Western Power