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Regional and Fire Management Services
Department of Biodiversity, Conservation and Attractions
Parks and Wildlife Service
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Submission: Proposed Wellington National Park Expansion

Forest Industries Federation of WA (FIFWA) is the association for the timber industry in Western Australia (WA). FIFWA is representative of the companies and businesses that operate in WA's timber industry, including the native timber harvest and haul operators and processors. This submission is made on behalf of those FIFWA members directly involved in the native timber sector of the industry and on behalf of the plantation sector. Whilst we make this industry submission we understand some of our members will also be making individual submissions to emphasise points of particular importance to their own businesses.

WA's native forest industry is valuable, generating \$220 million annually and almost 900 jobs in WA (Schirmer et al., 2017), in addition to the significant contributions made by industry to their local communities across regional WA.

Resource security is a high priority for the industry. Continued supply of native forest products is critical. FIFWA therefore appreciates the opportunity to provide the following comments, and notes that while we are supportive of multiple-use forests **we strongly object to the proposed expansion** due to the potential adverse impacts on the commercial viability of the timber industry.

FIFWA has been communicating concern over the proposal since the announcement in 2016, presenting at local council meetings, sending letters and holding discussions with relevant community groups and politicians. If required we are more than willing to provide additional information or answer any questions the Department of Biodiversity, Conservation and Attractions (DBCA) may have in respect to the industry submission.

Impact to industry

It is truly challenging to quantify the severe negative impact the proposed expansion would have on industry.

Using data provided by DBCA through Minister Dawson (personal communication, 18 December 2018), the economic impact of commercial timber forgone over the current 3-year harvest plan is estimated by FIFWA to be between \$8.7 and \$9.9 million. It is extremely unlikely that tourism in the region, due to the expansion alone, will generate a similar amount over the next 3 years.

Looking beyond the current 3-year native forest timber harvest plan and taking a longer view, information provided by DBCA (personal communication, 8 February 2019) indicates that around 120 000 tonnes of timber will be forfeited in the proposed expansion, worth between \$43 and \$50 million over the current 20 to 30-year cycle.

However, these numbers do not demonstrate the whole picture. Companies involved in WA's timber industry contribute significantly to their local communities through job creation and local spending; also through sponsorship of local sporting clubs, schools, events and community groups. A total of 1.8 indirect jobs are created for every direct job in native forests, and for each \$1 million expended by the native forest sector, 6 workers are employed directly (Schirmer et al., 2017).

The proposed expansion has already negatively impacted industry, with changes to harvest plans disrupting contractors' work flow schedules, business expansion plans and loan applications. The ripple effect is felt throughout the supply chain, compounding issues and eroding confidence. Further reductions in the amount of available timber to industry and the quality of timber available to industry; the lack of scale; and increased haulage distances (which result in higher logs costs) may result in closure of mills, and consequently harvest and haulage companies. The financial impact will be felt across the industry, resulting in potential job losses and an outreaching impact on communities such as Donnybrook and Collie, but also Bridgetown, Manjimup and Nannup. These communities all process and value add to native timber products, and would be expecting to process the timber from the areas under consideration in the proposed expansion. Not only those communities in the direct vicinity of the proposed expansion will be impacted.

While tourists may stay for a weekend, employees in the timber industry establish a life in "timber towns" – sending their children to school there, perhaps volunteering in local bushfire brigades and so on. The potential job losses will likely result in increased population decline and a hollowing out of rural communities. This effect has been documented in the recent report "The social and economic sustainability of WA's rural volunteer workforce" (Holmes et al., 2019).

Resource security

Resource security is key to the ongoing success of industry, and therefore of utmost concern. The proposed expansion further threatens resource security.

The proposed expansion undermines the integrity of the key forest policy instrument – the Forest Management Plan (FMP) (Conservation Commission of Western Australia, 2013). The FMP enshrines protection for the environment while providing a degree of resource and investment security for the timber industry. The statutory FMP has a life of ten years with a mid-term review framework. Each FMP is prepared through comprehensive, considered and extended research and consultation. The proposed expansion of the Wellington National Park is an arbitrary interference outside the exhaustive and thorough FMP process. The FMP represents a commitment to industry that the state government should uphold.

One of the findings of the draft mid-term performance review of the current FMP (Conservation and Parks Commission of Western Australia, 2018) was that the native forest industry did not operate to the full capacity of the production limits set in the FMP. There are a multitude of reasons and contributing factors that essentially boil down to resource insecurity. As harvest and haulage contracts are set to expire in 2023, companies are hesitating to invest and banks are hesitating to offer loans. Without this injection of funds, contractors are restricted, unable to expand their businesses in order to take full advantage of the production limits of their contracts. This situation has been exacerbated by the proposed expansion.

The proposed expansion also undermines the State and Federal bilateral agreement for a secure timber resource to the industry under the existing Regional Forest Agreement (Commonwealth of Australia and the State of Western Australia, 1999).

Further, the potential for the proposed expansion to set a precedent for other areas of State forest erodes confidence in investment and regional employment more broadly, again reducing resource security.

Multiple-use forests

As multiple-use forests are a tenet of WA's sustainable forest management practises, it makes little sense to change land tenure (and remove areas of available State forest) according to the current proposal.

FIFWA notes the Promote Preston group claims to be seeking an expanded national park for numerous tourism related benefits such as walk and bike trails, as well as to improve the salinity levels in the Wellington dam, and for job creation in the region (Promote Preston, 2018). The "Have Your Say: Expansion of Wellington National Park" brochure similarly notes the expanded opportunities for tourism and recreation. None of these objectives are incompatible with forests managed for sustainable timber production. Such activities are either currently in place or could be implemented in State forest without any need for a change in land tenure. Indeed if State forest becomes national park (as proposed), public access generally becomes more restricted.

Further, a recent joint media release from Environment Minister Stephen Dawson and Sport and Recreation Minister and Collie-Preston MLA Mick Murray noted that a "new world-class walk trail has been opened in Wellington National Park" (January 21, 2019). It seems highly unlikely that expanding Wellington National Park would provide significant benefit, as the current park appears to be attracting adequate visitors and the requisite funding for infrastructure improvements.

It is a false assumption that increasing the size of the national park area will increase visitor numbers. From past experience we know tourism in national parks will not off-set the value of the timber industry or replace the jobs likely lost. There are several socio-economic reports which support this point, including the URS Social and Economic Impact Statement on the Potential Impacts of Implementation of the Draft Forest Management Plan 2014-2023 (2012), which states;

'There had been an expectation at the time of the forest products restructuring in the early 2000's that tourism would provide an increasing contribution to the local and regional economies of the south west. Certainly the shire of Manjimup was hopeful that investment in tourism activities by the State Government and private investors would offset the losses associated with the restructuring. These expectations were not fulfilled as visitor numbers declined and the expected investment did not eventuate.' (pp 71)

Currently there are conflicts brewing in South Australia, Queensland and Tasmania, over proposals to develop tourism ventures to actually deliver regional economic benefits that are being vigorously opposed by elitist and exclusionary groups (Denholm, 2019).

Public firewood collection is prohibited in national parks, and State forest can provide this valuable resource to the community. In this regard, it seems that national parks are less accessible to the public.

Values captured by existing formal and informal reserves

The “Have Your Say: Expansion of Wellington National Park” brochure notes that the “expansion area...will improve the representation of nine vegetation complexes in formal reserves”. FIFWA holds that this additional reservation is unnecessary.

The current FMP ensures, and its draft mid-term review confirmed, that adequate environmental and cultural values have been captured by existing formal and informal reserves. At another level the RFA mandates that adequate areas and values are placed in reserve and not available for harvesting. FIFWA again submits that the proposed expansion is not necessary, adequate values are already under formal or informal reserve.

The Wellington National Park, Westralia Conservation Park and Wellington Discovery Forest Management Plan was published in 2008 (Department of Environment and Conservation and Conservation Commission of Western Australia, 2018). In accordance with section 55 of the CALM Act, the term of the final management plan will be 10 years, or until the plan is superseded by a new management plan. FIFWA submits that unless a review of the key performance indicators of that plan show evidence to the contrary – adequate values have been captured by the existing national park and the proposed expansion is not necessary.

Values captured by current forest management and silvicultural practices

As outlined in the current FMP and relevant silvicultural guidelines (Department of Parks and Wildlife, 2014) industry adheres to sustainable forest management techniques. So in addition to the values currently in formal reserve, actively managed State forests encompass a suite of values through conscious retention and exclusion. This includes fauna habitat trees; significant trees; stream reserves; old growth forest and other high conservation value forest; maintaining a broad range of forest ages, structures and composition, and so on. The draft mid-term review of the current FMP found the relevant performance targets and management activities were all achieved or completed. Research, particularly through the key forest biodiversity monitoring program, FORESTCHECK indicates that forest biodiversity is resilient to disturbance from current forest management and silvicultural operations (Conservation Commission of Western Australia, 2013). Additionally, the Forest Products Commission (FPC)’s operations in the South West native forest are independently certified by Australian Forestry Standard (AS4708:2013), and Environmental Management System (ISO14001:2015 – Environmental Management System) (Forest Products Commission, 2018). Therefore FIFWA holds that the proposed expansion is not necessary, as it will not capture any further values than under current practices.

The “Have Your Say: Expansion of Wellington National Park” brochure notes that the “expansion area provides high quality habitat for a range of fauna”. FIFWA holds that current management practices, including forest products harvesting under the FMP, already maintain and arguably created this high quality habitat. Again this was recently evidenced in the draft mid-term review of the current FMP. There is no need to change land tenure in order to capture and reserve high quality habitat for a range of fauna.

Further, the “Have Your Say: Expansion of Wellington National Park” brochure notes the “proposed areas also include registered Aboriginal heritage places and sites of other Australian cultural heritage”. Surely DBCA is well aware that such registered sites are already excluded from timber harvesting. Another reason the proposed expansion is unnecessary.

Indeed many of these values would not necessarily even be identified in a national park. With limited resources, government agencies are stretched and broadscale surveys of national parks are generally

not common. Alternatively, before temporary disturbance operations such as timber harvesting, proponents are required to submit a pre-disturbance checklist (DBCA, 2017). This is a comprehensive process involving GIS interrogation, fauna and flora surveys and so on. Values are often discovered through this process that would otherwise remain unrecorded and un-managed.

Another of the key components of the coupe level planning requirements for the FPC is consultation with neighbours and stakeholders. This process can result in the placement of visual buffers along roads and property boundaries, as well as other outcomes including the timing of harvesting in relation to recreational events. While certainly not a requirement, the FPC (with operational support from industry) also sponsors and enables recreational events in State forest for runners and bike riders. With such flexibility already present, and highlighting the multiple-use forest as above, FIFWA again holds that changing the tenure from State forest to national park unnecessary.

The “Have Your Say: Expansion of Wellington National Park” brochure also notes the proposed expansion “has the potential to deliver positive outcomes for Aboriginal employment through initiatives facilitated by DBCA”. While FIFWA certainly welcomes Aboriginal employment, and employment in general, it should be noted that there are current opportunities for Aboriginal employment in the industry and the FPC also has a cadetship initiative in place. There is no need to expand the national park in order to achieve these employment outcomes.

A well-managed forest is a healthy forest, providing significant economic values to industry and local communities, in addition to environmental and social values. In the years following the operation, a casual observer may be hard-pressed to discern forest that has been harvested from undisturbed forest. Scientific research confirms that “the imprint of harvesting 40 or more years earlier on species composition had become indistinguishable from that on grids never harvested” (Abbott and Williams, 2011). The values captured by current forest management and silvicultural practices procedures should not be discounted by this proposed expansion.

Silviculture

A disappointing outcome found by the draft mid-term review of the current FMP was that preferred silvicultural outcomes were not achieved for a large part of the jarrah forest. Certainly the proposed expansion will only further impede this. Reducing the amount of available State forest for timber production will reduce the amount of actively managed forest. The impacts of this are detailed below, in the sections addressing the drying climate and carbon.

The draft mid-term review also noted that the south-west native forest industry operated below the production limits set in the FMP. FIFWA recognises this is not the forum to explain the reasons, however it must be noted that the proposed expansion will further hobble industry.

Fire management

FIFWA holds that undermanaged national parks with high fuel loads pose a significant public safety concern. It is worth noting the Inquirer Euan Ferguson made the following observation in the Waroona Inquiry (2016);

‘The decline in hazard reduction burning can also be attributed to changes in forest policy in old growth forests. In the late 1980s there was a push from the community to establish national parks and nature reserves as a way of protecting old growth forests. The success of these movements saw the creation of the Shannon National Park and Lane Pool Reserve in the 1980s.

An unintended consequence of this change in forest policy is that the forest industry, which had previously played a significant role in fire suppression and hazard reduction burning, was no longer the fire management resource that it once was. From 2000 onwards large uncontrollable wildfires burning in forests with heavy fuel loads have become more frequent.'
(pp 94)

While DBCA has had recent success in achieving prescribed burn targets in the south-west forest regions (DBCA, 2018), the comparative dearth of prescribed burns in national parks and other reserves versus State forest remains concerning. Resourcing is currently available for DBCA to commit to their prescribed burn program, but the timeframe is uncertain.

Industry has always been proactive about fire management. Beyond the silvicultural applications of fire, industry has also collaborated with researchers and government agencies on mechanical fuel reduction trials. Operationalising this promising practise would likely not take place in a national park.

This raises concerns for the pine and blue gum sector of the industry. Most fires that damage valuable plantations burn in from lands external. Significant pine assets exist along or very near to the boundary of the proposed expansions. The pine industry is unsettled to have the tenure change, as options to mitigate the risk through prescribed burning and mechanical means will be more limited.

Another benefit of actively managed forest is road and track maintenance. Due to limited resources, roads and tracks in national parks are generally less well maintained than those in harvest coupes. Limited access causes significant problems during wildfire suppression. Industry contributes a significant amount to road and track maintenance. Conservative estimates are that industry has contributed about \$500 per kilometre to track maintenance in the coupes comprising the proposed expansion.

FIFWA submits that the proposed expansion will increase the risk of a large, uncontrolled wildfire in the region.

Disease management

Phytophthora dieback is a serious concern. Unmanaged and unsupervised activities have proven to be the most damaging in relation to the spread of dieback. The end of term audit report of the FMP 2004-2013 (Conservation Commission of Western Australia, 2012) states:

“Breaches in hygiene were mostly attributed to extensive illegal entry into protectable areas following an operation, particularly for public firewood collection. In some instances illegal access for firewood collection has resulted in unauthorised tracks being pushed into protectable areas.” (pp 123)

Similar outcomes were observed in the draft mid-term review of the current FMP with the majority of breaches due to unauthorised public access. With the proposed tenure changes, unauthorised public access is by definition going to increase, particularly with the removal of designated firewood collection zones – the public will continue to collect firewood on an informal basis.

As already mentioned national parks are under-resourced and undermanaged. With the exception of hotspots like Fitzgerald National Park, generally there are not enough resources to manage national parks for disease with the same intensity as harvest coupes, where hygiene management plans are created and monitored with close scrutiny. Coupes are rechecked every year, with complete remapping occurring every three years. Such intensive management is generally not applied in other areas.

FIFWA holds that it is unmanaged and unsupervised activities, not timber harvesting with approved hygiene management plans, that cause the greatest threat to the biodiversity values of a forest. Therefore FIFWA does not support the proposal.

Drying climate

Ecological thinning is a key management response to our drying climate, supported by research and accounted for in the current FMP. The draft mid-term review of the current FMP recommended investigating opportunities to apply silvicultural treatments that increase groundwater recharge and streamflow, and improve the resilience of affected ecosystems. Such opportunities will not be realised in an expanded national park due to tenure limitations.

A review prepared for the current FMP (Burrows et al, 2011) noted:

"Forest management to achieve a better water balance in a drying climate is a most critical issue facing forest managers now and in the future. As a consequence of a drying and warming trend since the 1970s, and a legacy of predominantly heavily stocked regrowth forests, these ecosystems are experiencing acute water stress.

If this issue is not addressed as a matter of priority, then the consequences will be undesirable, probably irreversible, and will likely compromise efforts to achieve ecologically sustainable forest management. Silviculture has a pivotal role in addressing this issue." (pp 1)

In 2014 the Intergovernmental Panel on Climate Change concluded with high confidence that extreme heat and reduced water availability, either singly or in combination, will be significant drivers of future population losses and will increase the risk of local species extinctions in many areas (Reisinger et al, 2014). The IPCC's conclusions consider each of the Representative Concentration Pathway models. Forests in the south west are at risk of permanent decline if standing volumes are not reduced to match that of water availability. The proposed expansion limits opportunities for silvicultural applications like thinning, thus increasing the risk of forest decline.

The jarrah forest is largely overstocked, and therefore suffering in this drying climate. Overstocked regrowth forests are less resilient. In south west WA the comparatively low amount of rainfall received today is not enough to sustain the comparatively high number of trees in the forest. North of Wellington National Park it is common to see drought deaths in summer-autumn when trees are most highly stressed (Figure 1).



Figure 1 - Drought deaths in the jarrah forest on the Wungong catchment.

Additionally, drought stressed forests do not respond to fire events as successfully as actively managed, thinned forests (also a reflection of the reduced resilience of overstocked forests). This has been observed and recorded in the Wellington Discovery Forest with much concern by the experienced foresters comprising the Friends of the Wellington Discovery Forest (personal communication, 13 December 2018). Following a fire that started adjacent to the Wellington Discovery Forest in December 2013, and then encroached the Wellington Discovery Forest - more than 60% of the jarrah trees were killed and no epicormic shoots have since appeared. Normally after a summer fire, most jarrah trees although defoliated by the fire, produce epicormic shoots and new leaves within a few months. The Friends of the Wellington Discovery Forest attribute this change to the low soil moisture at the time of the fire and consequently in the trees, due to both the drying climate and the impact of an overstocked forest. In areas of State forest it is possible to thin the forest or remove timber for sale as forest products, and therefore maintain a sufficient number trees to balance the water storage in the soil with a lower tree stocking.

By contrast, rules and regulations for national park tenure prevent silvicultural treatments such as thinning. A license to sell forest produce is only granted under limited conditions. This means if the predictions for a continued reduction in rainfall in the South West prove correct, drought deaths in national parks in the jarrah forest will not only become unsightly but will be hazardous for visitors as dead trees drop limbs and block roads and tracks needed for fire suppression access. This once again highlights the need for DBCA to commit extra resources. Industry is already committed to track maintenance and sustainable forest management in the areas impacted by the proposed expansion.

Rather than improving environmental outcomes, the proposed expansion could see negative impacts such as increased biodiversity loss in the area due to overstocked, over-mature stands in national parks dying in this drying climate (Matusick et al, 2013). There are also concerns that a drying climate, without thinning will reduce habitat availability, which is contradictory to the intent of the proposed expansion as outlined in the "Have your Say" brochure.

Actively managed State forests allow greater opportunities for water catchment management, through the thinning of overstocked regrowth forests. The draft mid-term review of the current FMP recommended that ecological thinning should be performed in State forests (as such activities are not permitted in national parks), acknowledging that previous trials using silvicultural treatments such as thinning had indicated a potential benefit to stream conditions. Besides serving an ecological function, thinning overstocked regrowth forests will increase streamflow of clean water, having a dilutive effect on the critically saline Wellington Dam. The proposed expansion is likely to result in less flow into the Ferguson and Preston Rivers and their minor tributaries, due to changes in forest management practices according to national park tenure. This could have a severe impact on the Leschenault catchment, with residents sharing their concerns at changing climate consultation workshops (South West Catchments Council, 2014). Without thinning and with modelled drying climates likely for the future, environmental flows to sustain aquatic and associated terrestrial systems are doubtful. FIFWA therefore does not support the proposal.

Carbon

While 'locking up' forest as a national park to seemingly capture the most carbon is appealing to some proponents, scientific research demonstrates that this is not true. To maximise total carbon abatement the full lifecycle of a forest and the products derived from it must be taken into account. Sustainably managed forests with periodic timber harvesting continue to increase the total carbon mitigation effect through the accumulation of carbon in multiple carbon stores. This is demonstrated in the 4th assessment report of the Intergovernmental Panel on Climate Change 2007 (IPCC) which states:

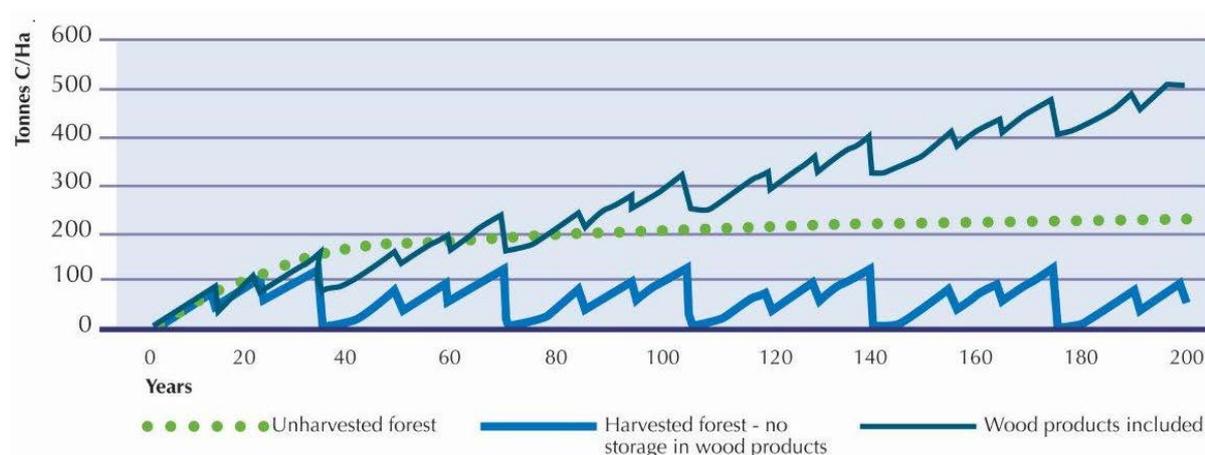
'A sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks while producing an annual sustainable yield of timber, fibre and energy from the forest, will generate the largest sustained mitigation benefit.' (pp 69)

A study by the New South Wales Department of Primary Industries (Ximenes et al 2012) also found:

'Managed, multiple use production forests have the capacity to store carbon on site; produce wood products that continue to store carbon off-site; provide substitutes for more GHG-intensive building products; minimise the need for GHG intensive imports and produce residues that can be used to generate renewable energy displacing fossil fuels. The data show total GHG emission abatement and carbon storage from a multiple use production forest exceed the C storage benefit of a conservation forest.' (pp iiiii)

Figure 2 below demonstrates the result that more holistic accounting methods can have on determining the carbon storage quantity of harvested and unharvested forests. While Figure 2 is based on a representative pine plantation, the principles used can easily be applied to native forestry operations. It is evident that when the carbon stored in timber products is included, the accumulation of carbon builds over successive harvests. Therefore, over time (80 years or more) the total carbon sequestered from a sustainably managed forest outstrips the carbon storage capacity of an undisturbed forest.

Figure 2: Carbon storage in harvested and unharvested forests.



Forest and Wood Products Research and Development Corporation (2006). Forests, Wood and Australia's Carbon Balance

Detrimental impact on carbon sequestration is another reason FIFWA does not support the proposed expansion.

Alternatives

FIFWA strongly opposes the proposed, unnecessary expansion. Should it proceed, it requires further modification.

If the expansion occurs, FIFWA submits that the land tenure changes required (gazetted) do not take place until after the allocated coupes have been harvested under the usual conditions, and at least until the end of the current FMP. This would provide industry with some resource security, and improve the fire and disease management outcomes for at least some areas of the proposed national park. Proper consideration must also be given to those coupes not on the current 3-year plan, but still within the boundary of the proposed expansion.

Failing that option, FIFWA submits that other land tenure changes are made at the same time, namely releasing specific areas of informal reserve and making them available state forest. The Fauna Habitat Zones (FHZs) D9, DR, D0 and DI were all finalised before the proposed expansion was considered by DBCA. Therefore many of the values that those FHZs captured, such as connectivity to national parks, will be accounted for by the expansion and render them obsolete. Rather than returning that area to the 48 400 hectare 'FHZ pool', FIFWA suggests that equivalent areas are returned to available State forest.

Other land tenure changes that should be made at the same time include a review of the old growth captured in the vicinity of the proposal. Industry does not want to harvest old growth forest, rather ensure that old growth forest is accurately mapped. Many experienced foresters believe that the amount of forest placed in reserve around Preston National Park for example is due to superseded old growth mapping techniques and technology. A review would likely trigger the release of available State forest.

The State should ensure that any management plan created for the expanded national park should commit to enhanced fire protection of assets near the park boundaries. FIFWA believes that this should include mechanical fuel reduction prior to gazetted, a fifteen-year return interval for mechanical fuel reduction, and no more than five years between prescribed burns upon the edges facing

plantation assets. The management plan should also include provision for ecological thinning of regrowth native forest to improve habitat value and promote mature forest structures so important for fauna.

On behalf of our state's vibrant timber industry, FIFWA requests improved active consultation in the consideration of alternatives and compensation. Transparency and openness are required in situations like these, and indeed are values of FIFWA, DBCA and the FPC. Government agencies need to work collaboratively – providing useful data in a timely manner, regardless of perceived barriers between agencies under different Ministers. Without adequate, specific information, appropriate alternatives will not be identified.

While FIFWA has generally been kept informed and consulted throughout 2018, the level of detail provided could certainly have been improved. FIFWA **requests an impact on industry statement** be prepared and shared with industry. This should include revised sustained yield calculations.

DBCA noted in its 2017-2018 annual report that a “technical assessment and indicative design were prepared to facilitate consultation on a proposed expansion of Wellington National Park.” Such information would be appreciated by industry.

Compensation

As previously communicated, if the proposed expansion proceeds in the manner presented and coupes are removed from current and future harvest plans this will cost the industry up to \$50 million. Industry must be fairly compensated for any loss of available State forest for timber production associated with the proposed expansion.

That basic notion of free, prior and informed consent holds here also with FIFWA requesting active consultation regarding compensation as this will be a complicated matter.

It must be remembered that simply bringing other coupes forward on the harvest plan is **not** compensatory. Those coupes are already available to industry. Further changes to the harvest plan disrupt contractors in the short term, limit future options in the long term and may also negatively impact sustained yields.

It also must be noted that replacing these coupes is not a simple matter, with due consideration required regarding product breakdown, quality, volumes, haulage distances, supply cost and so on. The ‘Social and Economic Impact Assessment on the Potential Impacts of Implementation of the Draft Forest Management Plan 2014-2023 (URS, 2012) identified that it is not only volume but log quality and production costs that also influence the viability of the industry.

Further it is not simply a matter of future profits. As mentioned above, industry contributes to road and track maintenance, with conservative estimates of about \$500 per kilometre in the coupes comprising the proposed expansion. Industry also invests in forest and stand improvement, with estimates of around \$150 to \$200 per hectare in Yabberup block for example. Disruptions to harvesting schedules not only inconvenience industry but have serious ramifications for employment and investment. Significant amounts have already been spent, and this must be accounted for when calculating compensation.

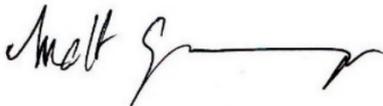
Conclusion

FIFWA strongly opposes the proposed expansion.

Economic modelling will be able to estimate the dollar value of the forest products forfeited by the proposed expansion. While serious, the dollar value is not industry's only concern. Our primary concern is resource security. The industry needs resource security in order to remain viable.

The current tenure of State forest in the proposed expansion already allows for the recreational and tourism activities suggested. The current harvesting operations, guidelines, policies and management plans already ensure that adequate values are in reserve. FIFWA disputes the supposed benefit to communities, the environment, and the economy through the proposed expansion. FIFWA does however recognise the proposed expansion as a serious threat to resource security and is deeply concerned about potentially setting a precedent for other single-issue activist groups in other locations.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Matt Granger', with a long horizontal flourish extending to the right.

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