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Better Regulatory Practice
Department of Water Environmental Regulation
Locked Bag 10
JOONDALUP DC WA 6919
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Dear Sir/Madam

DRAFT GUIDELINE: REDUCTION, WAIVER OR REFUND OF CLEARING PERMIT APPLICATION FEES

The Forest Industries Federation of WA (FIFWA) is the industry association for the timber industry in Western Australia. Our membership includes all the major companies and businesses that operate in the WA timber industry, including commercial plantation growers and managers, harvest and haulage operators, and timber processors in both the plantation and native timber industry sectors.

We welcome the opportunity to provide comment on this draft guideline.

Our view on the draft guideline is that it is too restrictive and is blind to the significant difference between “clearing” and silvicultural intervention. When considering silvicultural intervention, delivering improved viability and productivity of native forest, clearing permits should not be required. The regulatory framework should be sufficiently intelligent to distinguish between the two interventions.

The following excerpt, from our January 2020 submission regarding the proposed amendments to the EP Act, should suffice in reflecting our views in this matter.

Clearing (Thinning) of Native Vegetation

The fact that silvicultural intervention in native forest requires a “clearing” permit under the EP Act suggests a fundamental misconception around the nature of such activity. The language of this legislation should be overhauled and made accurate and contemporary.

Those who are amending the EP Act need to familiarise themselves with the “Djarlma Plan for the WA Forestry Industry” released by the State Government in July 2019. Amongst other matters, the Djarlma Plan speaks of the importance of ecological thinning involving the commercial removal of regrowth to demonstrate improved forest health and resilience. The focus on ecological thinning has

been underscored by the dramatic decline in winter rainfall over many decades and the excessive density of regrowth forests.

Measures like ecological thinning and the related mechanical fuel reduction should be facilitated by government policy, not hamstrung. Loading excessive costs on proponents seeking enhanced environmental and productivity outcomes from native forests, simply encourages neglect of the forest estate.

A key lesson of the 2019/20 Australian fire season is surely that the community will not accept policies that overlook the excessive accrual of fuels in forested lands. The community is also intensely interested in ecological thinning and retaining access to our forests. The WA Government is to be commended in retaining its enhanced prescribed burning program.

We value this opportunity to provide feedback on the draft guideline.

Yours sincerely,

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

Matt Granger
Chief Executive Officer (Acting)

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