

DUPLICATE



*Submissions on Management Plans for  
Northern, Central and Southern Forest Regions,  
Supporting Papers,  
Timber Production in Western Australia.*



Department of Conservation and  
Land Management, Western Australia

DECEMBER 1987

**SUMMARY OF PUBLIC SUBMISSIONS FOR  
REGIONAL MANAGEMENT PLANS  
FOR THE NORTHERN, CENTRAL AND SOUTHERN FOREST REGIONS,  
SUPPORTING PAPERS,  
AND TIMBER PRODUCTION IN WESTERN AUSTRALIA  
DECEMBER 1987**

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MANAGEMENT PLANS NO. 9, 10, 11

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## PREFACE

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In April 1987 CALM released Draft Management Plans for their Northern, Central and Southern Forest Regions, together with Supporting Papers for those plans and Timber Production in Western Australia (Draft).

Public submissions were invited.

This document summarises and discusses those submissions received.

As a result of these submissions and wishes of the Controlling Bodies, the above documents have been finalised.

# INTRODUCTION

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Comments have been detailed according to the section of the draft plan to which they refer. Every minor detail has not been included.

The draft management plans (DMPs) for the Northern, Central and Southern Forest Regions and 'Timber Production in Western Australia (draft): A strategy to take W.A.'s forests into the 21st century' (hereafter called the timber strategy) were released by the Premier of Western Australia, Mr B. T. Burke, MLA at 'Technology Park' Bentley on 13 April 1987. It was announced that the plans were available for comment until 17 June 1987. This was extended until 17 July 1987, to accommodate the number of respondents who felt that the depth and scope of the report required extra time to collate a submission. Submissions received after this date were also considered.

The DMPs and timber strategy were also presented at meetings in Perth, Bunbury and Manjimup. These presentations received comprehensive news media coverage.

The Department extensively advertised and promoted the plans in the following manner.

## Media Publicity

15 000 copies of the booklet 'What Future For Our Forests' (hereafter referred to as the 'booklet') were printed.

A video titled 'What Future For Our Forests' was produced and 45 copies were distributed.

Announcements (advertisements) were placed in appropriate local and State newspapers.

338 500 colour newspaper inserts were distributed in the 'Sunday Times', 'South-West Times', 'Warren-Blackwood Times' and 'Albany Advertiser'.

Media releases and media responses to issues raised, were organised. (In the 'Warren-Blackwood Times' this was done weekly.)

Various advertisements were placed in newspapers for the establishment of an enquiries hotline.

An article was featured in the CALM 'Landscape' magazine.

## Distribution of Letters, Booklets and Management Plans

Up to 3 200 sets of the Management Plans (including Supporting Papers and timber strategy) and 14 000 booklets were distributed.

Letters inviting submissions and enclosing a booklet were forwarded to divisions and branches of political parties, tour operators, tourist bureaux and those who have written to the Department or Minister in the last 15 months on forest management matters.

Letters offering briefings by CALM staff and enclosing the booklet were sent to local government authorities, tourist bureaux, Apex Clubs and environmental, recreation and community groups.

A circular and booklet were sent to social studies senior masters in Western Australian high schools.

A booklet was forwarded to all individuals who responded to the newspaper insert.

Booklets were handed to visitors to Yanchep, Walyunga, John Forrest and Serpentine National Parks during the Easter break.



Booklets were distributed to timber industry workers in the Southern Forest Region.

The DMPs, accompanying Supporting Papers explaining the management plans, and timber strategy were distributed to State and Commonwealth Government departments, tertiary institutions, conservation groups, recreation groups and individuals who had expressed an interest in management plans for these areas. Plans were also distributed to local interest groups and those who submitted comments prior to the release of the DMPs.

Plans were available for purchase or inspection through the Department of Conservation and Land Management's (CALM) metropolitan, regional and district offices. In addition,

plans were available for inspection at the local shire offices and libraries.

## **Meetings, Talks and Briefings**

A total of 90 groups were addressed, including Cabinet, Environmental Protection Authority, bush fire brigades, Government agencies, timber industry, conservation groups, Apex Clubs, academics and public meetings at Perth and Fremantle.

## **ANALYSIS OF PUBLIC SUBMISSIONS**

The public submissions pertaining to the Northern, Central and Southern Forest Region draft management plans and the timber strategy were reviewed in three stages.

First, the public submissions were summarised to allow analysis. This document provides that summary.

## **CRITERIA USED TO ASSESS SUBMISSIONS**

All submissions were analysed using set criteria based on those used to develop the prescriptions for the draft management plans and timber strategy. Changes were then made to the plans depending on whether the submission:

- indicated a change in political commitment, legislation and/or management policies (A);
- provided additional relevant information on biological, physical and social resources (B);
- provided additional information on affected user groups (C);
- referred to a marked lack of clarity in the existing prescriptions (D);
- indicated that prescriptions on a particular issue were needed and had not been included in the DMPs (E);
- indicated tenure constraints (F).

There are two reasons why a section may have received submissions but was not revised:

- most submissions supported the draft plan proposal, so that no revisions were necessary;
- revision was not feasible.

Third, the DMPs and timber strategy were reviewed and amended where necessary. Tables 1 and 2 provide a summary of the changes made and reasons for each revision (assessment criteria) for the major issues. Other minor editorial changes referred to in the submissions have also been made.

The revised prescriptions were considered and endorsed by the Policy Directorate, National Parks and Nature Conservation Authority, Lands and Forest Commission and Forest Production Council. The plans were then forwarded to the Minister for Conservation and Land Management for approval.

Prior to forwarding this document and the amended plans to the Minister for approval, these documents have been made available to the relevant Shires for consideration. Any comments they make will be made available to the Minister.

**Table 1**  
**Summary of main changes made to the Draft Regional Management Plans**  
**and Supporting Papers**

SECTION OF FINAL PLAN	HEADING OR ISSUE	SUMMARY OF CHANGES MADE (a)	RELEVANT AS- SESSMENT CRITERIA
-	Regional plan and supporting papers	The two documents were combined	A
1	Changes to be introduced	Replaced State park and forest park/reserve with conservation park. (This resulted in numerous changes in other sec- tions of the plans)	A
1	Criteria for al- location of land to CALM categories	Added new section	E
2	Native fauna lists	Amended	B
2	History and land use	Added new section: water production	B
3	Changes in tenure, vesting, purpose	Reallocated all State parks and forest park/reserves. Changed some other proposals. Added sections on evaluation and review processes, major chan- ges, origin and fate of conservation and recrea- tion priority areas in State forest	A,B,F
3	Land dedica- tion and acquisi- tion	Changed strategy (iii) in NFR, (v) in CFR, (iii) in SFR	D
3	Conservation of flora, fauna and landscape	Expanded definition of conservation	B
3	Flora and fauna	Amended lists of rare species	B
3	Flora and fauna	Changed strategy (i) in SFR, (v) and (xi) in CFR	D
3	Caves	Added caves near Yanchep and Harvey Es- tuary, changed strategies in NFR	D

SECTION OF FINAL PLAN	HEADING OR ISSUE	SUMMARY OF CHANGES MADE (a)	RELEVANT ASSESSMENT CRITERIA
3	Fire	Changed strategy (iv) in CFR and (iii) in SFR. Changed strategies (vi), (viii), (ix), (x) and added strategies (xiv), (xv) and (xvi) in NFR	E
3	Weeds and pests	Added mention of non declared weeds, including veldt grass, added new strategy (i) and changed strategy (v) in NFR	E
3	Rehabilitation	Added areas treated by Forest Improvement and Rehabilitation Scheme in NFR and CFR. Added remedial treatment of old bauxite rehabilitation by Alcoa. Changed strategies (iii) and (iv) in NFR	B
3	Recreation	Added tourism expenditure figures	B
3	Day use	Added strategy (ix) in NFR and strategy (x) in CFR	E
3	Camping	Added 'no backpack camping on developed catchments, other than at approved sites.' Deleted strategies (ii) and (iii) in SFR	D
3	Horse riding	Added strategy (v) in SFR, changed strategy (i) in NFR	E
3	Community education and interpretation	Added strategy (iv) in NFR	E
3	Water	Mentioned WAWA 'Sources Development Plan' and 'Planning Future Sources for Perth's Supply' in NFR and CFR. Added strategies (vii) and (viii) in NFR and (iv) and (v) in SFR	E



SECTION OF FINAL PLAN	HEADING OR ISSUE	SUMMARY OF CHANGES MADE (a)	RELEVANT ASSESSMENT CRITERIA
3	Hardwood Timber	Added strategy (v), changed strategy (vi) in NFR, changed strategy (v) in CFR, (i) and (x) in SFR. Mentioned silicon project in CFR. Deleted strategy (xi) in SFR	E
3	Softwood Timber	Changed strategy (vi) and added strategy (viii) in NFR. Changed strategy (vi) in CFR, (v) in SFR	E, A
3	Mining	Changed strategies (ii) and (iv) in NFR	E, B
3	Wildflowers	Added the comment that commercial picking is not permitted on conservation reserves.	D
3	Nurseries	Deleted reference to Hamel nursery. Changed strategy (i), added strategy (ii) in NFR	A, E
3	Apiculture	Changed strategy (i), added strategy (iv) in NFR	D, E
3	Fishing	Added strategy (iv) in NFR	E
3	Public utilities	Added strategies (iii) and (iv) in NFR	E
4	Research	Added new section	E
7	Glossary	Expanded	D
Appendix 3	Comparison between EPA, Forests Dept. and regional plan proposals	Added new section	E
Appendix 4	Conservation reserves proposed by this plan	Added new section	E

(a) NFR - change made in Northern Forest Region plan, SFR - change made in Southern Forest Region plan  
CFR - change made in Central Forest Region plan, if not stated then the change has been made in all three plans

**Table 2**  
**Summary of major changes made to the Draft Timber Strategy**

SECTION FINAL STRATEGY DOCUMENT	HEADING OR ISSUE	SUMMARY OF CHANGES MADE	RELEVANT AS- SESSMENT CRITERIA
2	Demand for fire wood	Replaced figures in draft timber strategy	C
3	Areas of forest	Replaced figures in draft timber strategy	E
4	Forest based in- dustries	More information sup- plied on Industry Groups	C
4	Training	Clarified commitment to promoting training and quality control ser- vices	E
5	Sustained Yield	More information sup- plied	E
5	Logging Con- tracts	Modification of the log- ging contracts proposals	C
5	Jarrah and Karri Growth Models	Modified commitment to growth model development	A
6	Regulation of the Cut	Allowable cut proce- dures clarified	E
6	Tables 14 to 17	Tables reformatted	E
7	Allocation of hardwood sawlogs	Increased flexibility in allocated percentages	C
7	Allocation of minor Forest Produce	Reduced area of com- mitment to Northern Forest Region	C
7	Allocation of sawlog to major and medium mills	Clarification of intent	E
7	Forfeiture of resource	Changed to a more flexible system	C
7	Allocation of Pine Resource and mill size	Clarification of intent	E

During finalisation of the management plans, CALM worked closely with the Environmental Protection Authority (EPA) to ensure that the intent of the EPA's recommendations for Systems 1, 2, 4 and 6 were properly reflected in the plans. A comparison between EPA, Forests Department and CALM proposals is contained in Appendix 3 of the three regional management plans.

## STATISTICAL SUMMARY OF SUBMISSIONS

### Number and Origin of Submissions

Submissions were in two forms: letters from individuals, groups and Government departments (see list of submitters in Appendix 1); and 'pro forma' letters organised by various groups.

The number of submissions in each category were:

Substantial submissions and letters	564
Pro forma letters:	
supporting conservation group submissions	1524
supporting timber industry and union submissions	1864
supporting apiarist submissions	<u>24</u>
TOTAL	<u>3976</u>

A total of 30 different types of pro formas were received, as described in Appendix 2.

The proportion of substantial submissions prepared by individuals and various organisations is shown by the following chart.

Substantial submissions were received from:

Government departments or authorities	22
Local government authorities	16
Timber industry companies or organisations	31
Other companies or related organisations	68
Conservation groups	18
Individuals (including 75 from school students)	<u>409</u>
TOTAL	<u>564</u>

(Many individuals put in more than one submission)

The place of origin of the substantial submissions was as follows:

from Perth Metropolitan Area	201
from Northern Forest Region excluding Metropolitan Area	40
from Central Forest Region	102
from Southern Forest Region	120
from elsewhere in the State	81
from outside the State	12
not stated	<u>8</u>
TOTAL	<u>564</u>

# **PART A**

## **DRAFT REGIONAL PLANS AND SUPPORTING PAPERS**

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### **1. GENERAL COMMENTS**

A total of 410 substantial submissions commented on the draft management plans and Supporting Papers.

Many submissions praised the Department for seeking public participation in preparation of the final management plans.

Numerous submissions suggested longer periods for public comment, ranging up to 12 months. Several submissions commented on the public review process. One submission suggested that the analysis of public submissions be done by an independent body. Another submission suggested that the Environmental Protection Authority (EPA) review the submissions.

The South West Development Authority recommended that a formal public communication forum be conducted on the public submissions.

Many submissions sought greater detail in the draft plans, particularly biological data, reserve areas and criteria for the proposed reserves. Three submissions requested vegetation type areas by proposed reserve categories in the Northern and Central Forest Regions, as provided in Table 3B for the Southern Forest Region.

One submission criticised the lack of mention of national estate places in the draft plans.

Two submissions referred to differences between regional strategies. Two submissions suggested that the regional strategies were so similar that the three regional plans could be combined in one volume. One submission suggested that an index be provided for each plan. Another submission suggested inclusion of simple statements of revenue and expenditure, proposed and desirable funding for each region. A further submission suggested that management options should have been presented.

Numerous submissions considered the maps in the plans to be inadequate or confusing. One submission suggested that Map 5 (CALM estate as at 1986) and Map 6 (proposed changes in tenure, vesting or purpose) be the same scale to facilitate comparison between them. Most criticism was directed at Map 6 and its accompanying Table 6. Some submitters found difficulty in interpreting Map 6 due to the numbering, and some proposed changes too small to readily interpret on the scale of map used. A small number of errors or inconsistencies were detected on Maps 1 (current land tenure), 3 (vegetation), 6 (proposed changes in tenure, vesting or purpose), 7 (CALM estate proposed by this plan), 8 (management priority areas for State forest), 10 (recreation opportunities) and 11 (catchments and dams).

### **2. THE DEPARTMENT AND ITS PLANNING PROCESSES**

A total of 10 submissions commented on this section.

#### **Origin of the Department and the Controlling Bodies**

One submission suggested CALM be separated into a Department of Conservation and a Department of Forestry.

A small number of submissions suggested changes to the National Parks and Nature Conservation Authority (NPNCA) and/or Lands and Forest Commission (LFC), including:

representation for recreation groups and institutes;  
timber industry representation on the NPNCA;  
combine the NPNCA and LFC;  
creation of a forest management board.

## **Administrative Structure**

### **EXECUTIVE DIRECTOR**

One submission disagreed with the Executive Director being chairman of the Forest Production Council and Lands and Forest Commission. This submission also suggested having separate Executive Directors for Conservation and Production.

### **REGIONAL BOUNDARIES**

Two submissions suggested changes in the boundary between the Northern and Central Forest Region to locate all of Yalgorup National Park in the Central Forest Region and all of Kooljerrenup Nature Reserve in the Northern Forest Region.

These same submissions also suggested transfer of Federal, Waroona and Bell Blocks to the Central Forest Region.

Two submissions suggested changes in the boundary between the Southern Forest Region and South Coast Region. One of these advocated that all of the Denmark Shire should be in the Southern Forest Region and the other suggested that William Bay National Park be added to the Southern Forest Region.

## **Objectives of the Department**

One submission expressed concern that water is not mentioned specifically in CALM's primary objectives. This submission also pointed out that with respect to its production objective, CALM cannot regulate the supply of water as this is the Water Authority's responsibility.

One submission suggested modification of CALM's mission statement to replace 'without detracting from' to 'with consideration for'.

## **Land Management Planning**

Two Government departments questioned whether all of their proposed activities on CALM land during the period of the plans would have to be specifically mentioned in the plans in order for them to be allowed to proceed.

There was no criticism of CALM's hierarchy of five plans presented on page 5 of the Supporting Papers but a number of submitters sought more details in these regional plans, i.e. the level of detail that is presented in area management plans.

## **3. VESTING, TENURE AND PURPOSE**

A total of 197 submissions commented on this section.

### **Security of Tenure and Purpose**

Numerous submissions supported the proposal for security of purpose as well as tenure for lands managed by CALM. A small number of submissions supported security of purpose for conservation reserves but opposed security of purpose for production areas.

A small number of submissions opposed any change to existing levels of security of purpose.

Submissions from the mining and apiary industries requested 'security of tenure and purpose' for their industries.

Two mining industry submissions suggested that it should be necessary for both Houses of Parliament to agree to the creation of any new A class reserve. Currently this is not the case, but agreement of both Houses of Parliament is required to change the tenure of an existing A class reserve.

A number of submissions sought explanation for the statement on page 9 of the Supporting Papers that security of tenure of State forest is 'similar' to that of an A class reserve.

One submission suggested that the plans confuse purpose and land use.

Numerous submissions requested that conservation reserves (national park, nature reserve, State park, forest park/reserve) always be afforded A class status. One submission suggested that State forest always be B class so that it could be easily reclassified.

## **Proposed New System of Reserve Categories**

Numerous substantial submissions and pro formas commented on this section of the plans and on the proposed compatibilities between land uses and reserve categories.

### **GENERAL**

Many submissions supported the new system of categories proposed in the draft plans.

### **FOREST PARK/RESERVE**

The proposed new category of forest park/reserve received most comment. Many substantial submissions and a proportion of the pro formas opposed logging of forest park/reserves. Many of these submissions also opposed other production activity in forest park/reserves, most notably mining. There was also a significant level of support for production activity in conservation reserves. For example, a number of submissions supported some logging in national parks, ranging from salvage of windblown trees to clearfelling and regeneration treatment. One major submission suggested that it was illogical to preclude timber production from some forest park/reserves and not others, and suggested that these areas were therefore inappropriately classified.

Numerous submissions advocated that forest park/reserves be reclassified as national park, nature reserve, State park or State forest. One submission suggested that 'forest reserve' was a better name than forest park/reserve.

The Department of Resources Development pointed out that the definition of purpose of forest park/reserve in the draft Supporting Papers (production of renewable resources on a sustained yield basis) did not appear to allow mining in these areas.

### **STATE PARK**

Several submissions commented on State parks. A majority opposed the category, preferring such areas to remain national park. A number of submissions considered that some of the proposed forest park/reserves should be State parks or vice versa. One submission suggested that 'conservation park' was a better name than State park.

### **GAME RESERVE**

Two submissions advocated a category of game reserve. A number of other submissions advocated designation of areas for game shooting or areas where hunting of pest species is permitted.

### **TIMBER RESERVE**

One submission opposed this 'transitional' classification, suggesting that such areas should be State forest.

### **MARINE PARK**

Two submissions suggested that some areas of marine parks be zoned for no fishing.

### **EXECUTIVE DIRECTOR LAND**

One submission suggested that this land be vested as a Crown reserve in an appropriate body, rather than retained as private property.



#### **'LOCAL AREA PARKS'**

One submission suggested a new category of 'local area park', i.e. small areas to be available for nature conservation, bush walking and private firewood collection.

#### **'STATE RESERVE'**

One submission suggested use of the term 'State reserve' for all nature reserves, State parks, forest park/reserves and marine park/reserves to avoid unnecessary complexity.

#### **'SCENIC RESERVE'**

One submission proposed amalgamation of State park and forest park/reserve into a single 'scenic reserve' category.

### **4. PROPOSED CHANGES IN TENURE, VESTING OR PURPOSE**

A total of 231 submissions commented on this section.

#### **General**

A number of substantial submissions and pro formas supported the proposed increase in conservation reserves or wanted more areas reserved. A further number of submissions considered that too much land was proposed for conservation reserve.

One submission suggested the need for a strategy in each region to state how much land should be allocated for conservation, recreation or production.

Numerous submissions requested more information about the proposed reserves or more detailed justification for the draft proposals. Several submissions referred to Environmental Protection Authority recommendations, notably for System 6, asking why they had not been implemented, or when they were to be implemented.

Numerous submissions requested more extensive reservation of virgin or mature forest. Several submissions requested reservation of all remaining areas of virgin forest.

Three submissions considered that the draft plans should have more forcefully made the point that all reserve proposals within areas covered by mineral Agreement Acts are subject to review by the Reserves Review Committee and decisions by Cabinet.

Three submissions considered that all proposed reserves should be mapped for minerals, for example by the State Geological Survey Branch. If this survey showed the area to be promising for mineral production then either it should not be reserved or provision should be made to allow access for exploration and mining.

One submission suggested that national parks should not be established in areas with potential for timber or mineral production.

One submission considered that no areas should be designated for timber production before being surveyed for biological and anthropological values. Numerous submissions opposed permanent allocation of native forest to wood production until it has been fully assessed for its biological, recreational and heritage values.

One submission suggested that marine parks be established 'in' the three forest regions.

#### **Northern Forest Region**

Some substantial submissions and numerous pro formas supported the reserve proposals in the draft plan. Another submission supported the proposed national park extensions. One submission wanted all of the existing national parks retained, i.e. none downgraded to State park.

Several submissions requested additional reserves in the wandoo woodland.

Three submissions advised that the Reserves Review Committee has considered and finalised boundaries of Dale, Monadnock, Serpentine (MPA) and Lane Poole Reserve, all of which are now A class reserves.

Four submissions proposed that the EPA System 6 M34 area be made a Helena Valley National Park or A class reserve managed by CALM.

One submission proposed that EPA System 6 areas M77, M78, M79, M80 and M81 be made A class reserves.

One submission proposed that reserve C 34103 (System 6 M32) near Mundaring be made an A class State park.

Another submission proposed that reserve 33139 near Mandurah be made an A class reserve managed by CALM.

Two submissions suggested that Table 6 items 47 and 48 not be added to Julimar forest.

One submission suggested that EPA area M31 be an A class reserve and another suggested that EPA area M21 be added to John Forrest National Park.

One submission supported the proposed extensions to Avon Valley National Park.

One submission proposed Boonerring-Duncan-Wells be made a nature reserve. One submission suggested Boyagarring be made a nature reserve.

One submission suggested Cooke be made a nature reserve. Another submission suggested the Caraban area be extended east to Wanneroo Road and south to private property.

Dale was suggested as a nature reserve in two submissions. One submission suggested that an influence zone around Dwellingup town site be made an A class reserve. Another submission suggested a 1 km wide nature reserve along the Hotham Valley railway from Dwellingup to Etmilyn siding. A further submission requested that a major reserve be created north-west and south-east of Dwellingup.

Single submissions suggested Gunapin as a national park and Gyngoorda as a nature reserve.

Three submissions recommended that Julimar be made a nature reserve. Another submission suggested that Julimar be available for timber production, firewood collection and gravel. One submission suggested the addition of the Army Training Area to the proposed Julimar reserve.

Three submissions proposed Lane Poole Reserve as a national park and one suggested it be a nature reserve. Another submission proposed it be increased to 100 000 ha and a further submission wanted it increased to 150 000 ha. One submission suggested that the Lake Leschenaultia area be a State park. Lupton was suggested as a nature reserve in another submission.

One submission supported the reclassification of Lesmurdie Falls National Park as a State park.

Two submissions supported reclassification of Moore River National Park as nature reserve. One submission opposed this.

One submission proposed that areas 70-71 near Mundaring be State park. One submission proposed Monadnocks as national park, another suggested it be State park.

Two submissions opposed the reclassification of Neerabup National Park as State park.

Russell was suggested as national park in one submission and as nature reserve in another submission.

Serpentine National Park reclassification as State park was supported by one submission but opposed by another submission. Change of Serpentine MPA to State park was opposed by two submissions including one from the Department of Resources Development which said that this would be incompatible with a 1986 variation to the Alcoa Agreement.

One submission proposed Wandering as a nature reserve.

Two submissions supported the proposed extensions to Yanchep National Park. One submission suggested that the remaining uncleared State forest in the Moore River and Yanchep areas be reclassified to A class reserve.

The Water Authority opposed or sought to modify the proposals for North Dandalup, Araluen-Canning, Serpentine, Toodyay, 70-71 and 79-83 Mundaring, Ridges and Wabling.

## **Central Forest Region**

Three submissions advised that the Reserves Review Committee is reviewing Bennelaking, Lennard, Mullalyup, Noggerup, Preston and Westralia, within the Alcoa lease area. Any proposals for these reserves will be subject to review by a working group headed by the Department of Resources Development and subject to the group's recommendation to Cabinet.

The Water Authority opposed or sought to modify the proposals for Dalgarp and St John Brook.

One submission proposed that area 1 (near Boranup) be nature reserve.

One submission suggested that an area of Abba block, containing a rare banksia species, be reclassified from State forest to nature reserve.

Bennelaking was suggested as a nature reserve in one submission. Blackwood was suggested as a national park in three submissions, as a State park in one submission and a forest park with logging precluded in two submissions. Boranup was suggested as national park in numerous submissions, as nature reserve in one submission and a forest park with logging precluded in four submissions. One submission suggested that part of Bramley Block be set aside as an educational park. One submission recommended that the Bridgetown Jarrah Park be given reserve status, two suggested it be a State park and one requested that it not be logged. Three submissions supported the Bridgetown State park proposal (reclassification from national park).

Two submissions proposed a Carlotta Brook reserve, two additional submissions suggested it be a nature reserve and another two wanted logging precluded.

Three submissions supported Dalgarp as nature reserve but one of these wanted it doubled in area. Dardanup was suggested as a state park in one submission.

An Ellis Creek King Jarrah Reserve was proposed in several submissions. Various submissions suggested it be nature reserve, national park and forest park.

One submission agreed with Greenbushes as a forest park/reserve. Four suggested it be State park.

One submission recommended that Gingilup Nature Reserve be reclassified as A class and suggested that vacant Crown land north and east of this reserve be made national park. Two submissions suggested that Golden Valley Tree Park near Balingup be made forest park/reserve. One submission suggested that Goonac be a State park.

One submission requested that Hester Block be a miscellaneous reserve and another suggested it be a forest park/reserve with timber production precluded.

Kemerton was suggested as a State park in one submission but another suggested that it could not be considered as a conservation reserve in view of the amount of industrial activity planned for it.

Lennard was suggested as a nature reserve in one submission. Three submissions proposed Lane Poole Reserve as a national park and one suggested it be a nature reserve. Another submission proposed it be increased to 100 000 ha and a further submission wanted it increased to 150 000 ha. The Ludlow national park proposal was supported by numerous submissions with many of these suggesting that the national park be expanded to include adjoining tuart-pine stands and/or additional areas of tuart on Crown land. One submission proposed Ludlow as a State park and another suggested it be forest park/reserve.

Milyeannup was suggested as an A class nature reserve in one submission. One submission suggested that all of Mowen MPA be nature reserve. One submission suggested that Mullalyup and Muja both be State parks. Another submission suggested a new reserve adjacent to Mornington Mills Road.

One submission suggested that Preston be a State park.

Rapids was suggested as a State park in one submission and as a nature reserve in another submission.

St John was suggested as a national park in one submission, though some other submissions proposing Blackwood as national park probably included St John. A further submission proposed

St John as nature reserve. Three submissions suggested that Stene be a nature reserve.

Four submissions opposed the vesting of Wournbelup and Chowerup vacant Crown land as Crown reserves.

One submission proposed a Vasse-Wonnerup nature reserve.

One submission suggested that the unvested Wagerup National Park be made forest park/reserve rather than State park. One submission suggested Westralia be a State park but another advised that it is under consideration by the Reserves Review Committee and suggested it be 'a C class reserve for coal mining and conservation'. One submission suggested that the vacant Crown land at Witchcliffe should be evaluated for agriculture before being considered as a conservation reserve.

Seven submissions supported the proposed extension of Yalgorup National Park.

One submission proposed creation of a new large forest park/reserve surrounding Nannup, to include Blackwood, Carlotta Brook Catchment, Darradup, Helms, Jalbarragup, Layman, Red Gully and Sollya Blocks.

## **Southern Forest Region**

Numerous submissions supported the draft plan reserve proposals. Most of these submissions requested that more areas be reserved. Numerous other submissions considered that too much area was proposed for conservation. One submission suggested that all proposed conservation reserves should be subjected to an ERMP and amendment if necessary. Another submission suggested that the proposed national parks should be forest park/reserves. The Water Authority opposed or sought modification to the proposals for Boorara, D'Entrecasteaux, Mt Lindesay, Muirillup, Shannon, Sheepwash and Strickland.

Two submissions suggested Beavis-Giblett be national park and two submissions recommended an extension of Beedelup National Park. One submission proposed Big Brook as State park.

The proposal to make Bolbelup a nature reserve was opposed in two submissions. Two submissions suggested that part of Bokerup Nature Reserve, including some historic sites, be made a forest park/reserve. One submission suggested that Boorara be a State park, another proposed that it be enlarged.

Two submissions supported the proposal to create the Brockman national park but two submissions opposed this if it did not allow for extension of the Pemberton pine sawmill which adjoins this area.



One submission suggested the area be a forest park/reserve. One submission proposed that Boorara be a national park, another suggested it be a State park.

One submission suggested that several small pockets of CALM land north and north-east of Denmark, many of which contain karri, be made nature reserves. Four submissions supported CALM's D'Entrecasteaux National Park proposal, but one suggested it be reduced and be classified as State park. Four submissions suggested that vacant Crown land on the south coast (currently proposed for addition to D'Entrecasteaux National Park) be released for agriculture. Two submissions suggested enlarging the proposed Dickson Nature Reserve. Another submission proposed that Dombakup MPA be a nature reserve. One submission proposed that there be a small Donnelly River Blackbutt forest park/reserve, while four other submissions proposed reserves near Donnelly townsite. Several submissions recommended that there be a large Deep River national park.

Two submissions suggested that Frankland MPA be State park.

One submission suggested that Glen Lynn Block be a miscellaneous reserve, another recommended that logging be precluded from this area and a further submission requested that the CALM land plus the adjoining rifle range area be forest park/reserve.

Several submissions supported the proposal to make Giants MPA a forest park/reserve. Others recommended it be made national park.

Two submissions recommended that Giants not be logged.

Several submissions supported the proposal for Hawke Block. Others requested that all of Hawke Block be made national park.

Jane Block was proposed for reservation in two submissions. One submission proposed it as nature reserve.

Two submissions suggested that Keystone be national park. One submission requested reservation of a suitable area near Kent River.

The Mt Lindesay State park proposal was supported by two submissions, but another submission suggested it be forest park/reserve. A further submission suggested it be extended west to join the proposed Wattle-Soho national park. Another proposed an extension north and east to private property and the Denmark-Mount Barker Road. Several submissions suggested it be extended to link up with the proposed Sheepwash National Park. Most of the latter submissions suggested this extended area be named the Mt Lindesay National Park.

One submission proposed extension of Muirillup and its reclassification as nature reserve.

One submission suggested that one nature reserve in the Lake Muir-Lake Unicup area be reclassified to forest park/reserve, to allow development of camping and other recreation facilities.

One submission proposed a reserve north-east of Northcliffe.

One submission suggested that timber production be precluded from the proposed One Tree Bridge forest park/reserve.

Perup (or some of Perup) was suggested as nature reserve in four submissions, and national park in one submission. Excision of some parts of Perup for gravel and minor forest products was proposed in another submission. One submission supported the proposal to make Perup a forest park/reserve. Another submission recommended that timber production be precluded.

Many submissions referred to the Shannon basin. The draft plan proposal (national park) was supported by numerous submissions. Many other submissions wanted part or all of the area available for timber production. A substantial number of submissions suggested some or all of the Shannon basin be forest park/reserve.

Some submissions suggested that the Sheepwash area did not warrant national park classification. One submission suggested it be forest park/reserve (and include adjoining nature reserves) and other submissions proposed it as State park or nature reserve. A further submission suggested it be timber reserve. One submission supported the classification of national park, as proposed. However, other submissions proposed the Sheepwash area be extended to link up with the proposed Mt Lindesay State Park and many of these suggested that the extended area be termed the Mt Lindesay National Park.

Three submissions proposed that the Sir James Mitchell National Park be retained. One submission suggested it be State park and another proposed it as forest park/reserve.

Three submissions suggested that the rather fragmented 'Swarbrick' forest park/reserve proposal be rejected and 'replaced' with a reserve further west in the Burnett- Ordinance-Dawson area.

Numerous submissions favoured the proposed 'Wattle-Soho' National Park. One submission was against it. One submission suggested extension of 'Wattle-Soho' into London Block to include an area of Rate's tingle and red flowering gum.

Many submissions supported the proposed extension of Warren National Park to include Hawke and Treen MPAs. One submission proposed extension of the national park north-west of Treen MPA to the Vasse Highway. One submission proposed reservation of a substantial proportion of the Warren River valley.

## **5. MULTIPLE LAND USE PLANNING AND MANAGEMENT**

A total of 36 submissions commented on this section.

For discussion of public comment on sustained yield and multiple use see the summary of public submissions on the timber strategy.

Three submissions sought clarification on land use terminology.

One submission asked for wilderness and sanctuary to be defined. Two submissions queried the terms 'passive' and 'active' recreation.

One submission questioned the difference between 'water production' and 'catchment protection'.

Some submissions disagreed with Table 2 in the Supporting Papers detailing the compatibility between land uses and reserve categories.

One suggested that water production could be conditional (rather than not compatible) with nature reserve if the dam was downstream and did not result in inundation of any of the nature reserve.

Another submission suggested that wilderness was conditional with nature reserve (rather than compatible) as there can not be any wilderness in a very small nature reserve.

Numerous submissions from apiarists and the honey industry disagreed that honey production was incompatible with national park, nature reserve and State park. These submissions considered that honey production is a passive activity and that it should be allowed in all conservation reserves.

## **6. ZONING OF STATE FOREST, PARKS AND RESERVES**

A total of 58 submissions commented on this section.

### **Broad Zones**

Numerous submissions opposed permanent allocation of native forest to wood production until the areas have been fully assessed for their biological, recreational and heritage values.



Numerous submissions requested greater or lesser areas to be zoned for conservation or production.

One submission expressed concern about the location of the boundary between catchment protection and production zones. This submission recommended that the boundary be placed at the 1100 mm rainfall isohyet in most cases.

Two submissions requested that there be no areas zoned for timber production anywhere near Denmark.

## **Other Special Zones**

Two submissions queried the significance of influence zones, one suggesting that mention of them be deleted.

There were numerous comments on road, river and stream zones. One submission recommended the development of road, river and stream zones in the Northern and Central Forest Regions, as in the Southern Forest Region.

Three submissions supported a review of road, river and stream zones in the Southern Forest Region. One opposed any change to the existing system. One submission considered it was acceptable to change road zones, another considered that stream zones should not be changed. One submission suggested that road zones be abolished, but the width of stream zones be increased and more water-courses be made stream zones. One submission requested more buffers on streams and expressed concern about logging in stream and river reserves. The Karri Region Advisory Committee requested involvement in the review.

Two submissions requested further information about these zones, such as criteria for their establishment, how their success or failure is assessed, results of the logging trials and more area data.

Numerous submissions expressed concern about 'hidden' conservation zones in State forest, adjoining national parks and other features, where timber production is precluded or reduced.

One submission supported logging in road, river and stream zones. Another submission supported salvage of dead and dying trees within road, river and stream zones. One submission stated that thinning would be of no silvicultural value in mature forest. Other submissions opposed logging of road, river and stream zones.

Several submissions proposed that road, river and stream zones be made A class reserves, one submission suggested they be zoned for conservation and protection, preferably as forest park, with logging precluded.

One submission cautioned giving them 'hard line boundaries' e.g. as a conservation reserve.

One submission pointed out that road, river and stream reserves are zones rather than 'reserves' and that they have no status under the Land Act or the CALM Act.

## **7. MANAGEMENT AND RESOURCES**

A total of 19 submissions commented on this section.

### **Departmental Administration**

Four submissions suggested changes in regional boundaries.

Plantaganet Shire questioned the tenure and vesting of some areas in their shire, as shown on Map 1 for the Southern Forest Region.

Two submissions suggested that there should be a greater CALM presence in the Bridgetown-Greenbushes Shire in view of the large area of pine forests being established.

One submission queried the lack of Wildlife Officers in the forest regions.

## **Physical and Biological Resources**

A number of submissions pointed out errors in Map 3.

Several submissions expressed concern about predictions of future reduction in annual rainfall which might reduce forest growth rates.

One submission suggested that vegetation type as used in the draft plans is incorrect and that the correct terminology is site-vegetation type.

Two submissions criticised the fauna lists. One suggested that they are unacceptable and meaningless. The other identified some errors in the Northern and Central Forest Region lists and suggested that these lists add little to the management considerations of the draft plans.

Some submissions criticised the lack of area statements of vegetation type versus tenure and land use in the Northern and Central Forest Region plans.

## **Social and Economic Resources**

One submission suggested an additional subsection on history and importance of water production in forest areas be included in each plan.

## **Land Tenure**

A number of submissions commented that Maps 5, 6 and 7 were difficult to use. Some submissions advised of errors in these plans.

## **8. DEPARTMENTAL POLICY STATEMENTS, MANAGEMENT GUIDELINES MANAGEMENT PROPOSALS**

A total of 144 submissions commented on this section.

## **Land Dedication and Acquisition**

### **Departmental management guidelines**

One submission criticised CALM's policy to continue survey of non-dedicated land, on the basis that CALM should confine such work to its own land. Two submissions criticised CALM's policy of opposing alienation of CALM land. One submission supported the policy to purchase suitable land but three submissions opposed this. One submission suggested that private land purchase should only be on the basis of equitable land exchange. Another submission proposed that some CALM land be alienated for horticulture.

### **Regional strategies**

Three submissions criticised CALM's opposition to granting grazing or other leases. Seven submissions supported this policy.

One submission suggested that in the Northern Forest Region CALM should support EPA reserve recommendations and other proposals for additions to CALM tenure 'subject to provision of adequate funds for management'.

## **Conservation of Flora, Fauna and Landscape**

One submission suggested that the full definition of conservation be given in the regional plans as was given in the Forests Department's General Working Plan no. 87 of 1982.

## **LANDSCAPE**

### **Departmental management guidelines.**

One submission supported the need for a landscape classification system. Another submission considered that location of roads and utilities should be based on economic reasons, rather than for landscape values. One submission suggested that landscaping principles should be applied to softwood share farming areas, where the landowner considered it appropriate.

### **Regional strategies**

It was suggested that CALM's role in providing landscaping advice should be promoted, in particular to landholders adjoining national park.

## **FLORA AND FAUNA**

### **Departmental management guidelines - Wildlife conservation.**

Two submissions supported CALM's objectives. One of these emphasised the need to provide sufficient resources to control illegal exploitation of wildlife.

### **Regional strategies**

One submission suggested that rare species seem to have been given undue weighting. One submission suggested that there be more co-operation with public groups and organisations with respect to flora and fauna management. Another submission suggested re-introduction of voluntary inspectors to assist in prevention of illegal taking of flora and fauna. One submission suggested that strategy (i) in the Southern Forest Region would be better expressed as 'continue research to test hypotheses leading to an understanding of pattern and process in ecosystems'.

Another submission was concerned about the level of monitoring required in the light of the limited resources available for such work.

## **WETLANDS AND ESTUARIES**

### **Regional preamble**

Some submissions referred to wetlands not listed in Table 8. Some of the wetlands suggested for inclusion are not on land currently managed by CALM. Others are on vacant Crown land proposed to be added to CALM tenure e.g. Lake Maringup.

### **Regional strategies**

One submission supported the rehabilitation of degraded wetlands. Another submission suggested that the Waterways Commission be included in the liaison list for the Northern and Central Forest Region.

## **MARINE CONSERVATION**

No specific comment was made on the Departmental management guidelines, regional preamble or strategies for marine conservation.

## **Cultural Areas**

### **Departmental management guidelines.**

One submission supported the objective and strategies presented in the Supporting Papers. One submission recommended surveys for cultural areas prior to logging. One submission considered that no management practices incompatible with national estate values should be carried out in places listed in the Register of National Estate.

## **ABORIGINAL SITES**

### **Regional preamble**

One submission provided details of some caves which have Aboriginal sites, in the Northern Forest Region.

One submission criticised the reduction of a rich and varied Aboriginal heritage to a catalogue of sites.

### **Regional strategies**

One submission supported the establishment of a register of Aboriginal sites in each region and suggested that where these sites are open to the public, they be featured in tourist brochures. Another submission suggested that greater emphasis was needed to protect known Aboriginal sites, and to restrict access to them.

## **HISTORIC SITES**

### **Regional preamble**

A number of submissions provided lists of additional historic sites. The National Parks and Reserves Association advised that St. Ronans Well in the Northern Forest Region is located in a special reserve vested in that association, not in the St Ronans' Nature Reserve.

### **Regional strategies**

One submission supported the establishment of a register of historic sites in each region and hoped that this would facilitate inclusion of appropriate sites in tourist brochures.

## **CAVES**

### **Regional preamble**

One submission provided details of a number of caves in the Northern Forest Region. Another submission provided confidential details about caves in the Leeuwin-Naturaliste Ridge. Another submission suggested that Yanchep National Park has up to 1 000 caves.

### **Regional strategies**

Two submissions pointed out inconsistency between cave strategies in the three regions. One submission suggested deleting strategies (i)-(iv) of the Northern Forest Region plan and replacing with strategies (i)-(vii) from the Central Forest Region plan.

## **Protection**

### **Departmental management guidelines**

One submission supported the guidelines but was concerned that CALM was trying to create a living museum rather than manage an evolving ecosystem. Another submission suggested that CALM should involve and encourage more community participation in environmental protection and rehabilitation of degraded areas.

A further submission suggested that strategies (i) and (ii) should include private developers and other departments e.g. 'develop and monitor in liaison with private concerns and other departments, environmental management conditions relevant to their existing or proposed activities on CALM land'.

## **FIRE**

### **Departmental management guidelines**

Several submissions supported CALM's current system of fire management. Others criticised various aspects of it. Numerous submissions opposed spring burning or preferred autumn burns. One submission advocated no prescribed burning or fire suppression in reserves (let the fires run) but acknowledged that this would require larger reserves. Apiarists and the Water Authority sought further information about prescribed burning likely to affect their operations. Two submissions suggested that there be more publicity about prescribed burning and its alternatives. Two submissions made the point that it is sometimes necessary to prescribe burn in one area, such as national park, to protect an adjoining area e.g. of private property.

### **Regional preamble**

One submission claimed that there was insufficient information on effects of prescribed burning on flora and fauna. The same submission criticised the lack of mention about effects on towns of smoke and ash from fires, and criticised regeneration burns.

### **Regional strategies**

A number of submissions supported more diversity in prescribed burning plans, including no burn areas in conservation reserves, variable or longer burning cycles, hotter burns and some spring and autumn burning.



One submission suggested changing Northern Forest Region strategies (ix) and (x) and adding another strategy, as follows:

- '(ix) Priority will be given to fire protection of high value production areas such as pine plantation, regeneration or rehabilitation areas and to high risk areas such as private property.
- (x) Plan fire protection requirements in advance of mining, logging or plantation establishment to ensure fire protection buffers are established within the area or in adjacent land.
- (xiv) Fire buffers may be established in conservation land when biological surveys have been done and results indicate the consequences will be acceptable as decided by the Executive Director'.

One submission suggested that the Central and Southern Forest Region plans should mention in strategy (iv) that the use of fire will be consistent with protection of ecological values (as well as life and property).

## **DISEASE**

### **Departmental management guidelines**

Several submissions suggested that all logging in native forests should cease as a dieback hygiene measure. Some submissions suggested that logging of dieback areas only should cease, while others suggested that logging of dieback free areas only should cease. Other submissions proposed that logging should cease only in Dieback Risk Areas.

One submission supported the guidelines and another supported continued research into causes, prevention and eradication of tree diseases. One submission claimed that the plans failed to address jarrah dieback as a major issue.

### **Regional preamble**

One submission emphasised the relationship between forest activity and dieback spread. Another submission criticised the statement that dieback cannot be eradicated and advocated intensified research into spot eradication of isolated dieback infections followed by treatment of such areas. A number of submissions expressed concern about *Armillaria* infections in karri forest.

### **Regional strategies**

One submission suggested that the Central Forest Region needs a strategy to say whether or not Dieback Risk Area (DRA) regulations are to be actively enforced and for future public access to DRA. Another submission criticised the current procedures for control of operations in DRA as excessively bureaucratic. This submission also suggested that dieback mapping be directed into areas where access to the forest is sought rather than trying to direct access into areas where dieback mapping is complete.

## **WEEDS AND PESTS**

### **Departmental Management guidelines**

One submission supported these management guidelines. Another confirmed that declared plants and animals are adequately covered.

### **Regional preamble**

One submission suggested that the weeds section is over-simplification of the situation and that South African veldt grass should be mentioned as an important weed on the coastal plain. Another submission pointed out that *Watsonia* is another common weed. Several submissions suggested that amateur hunters be allowed to control (shoot) pest species such as rabbits and foxes on CALM land. One submission requested that adequate funds be made available for pest control.

### **Regional strategies**

One submission suggested improved strategies as follows :

- '(a) In conjunction with the Agriculture Protection Board, prescribe a program to control declared plants and animals.

- (b) Carry out control programs on declared plants and animals on CALM Act land according to the following priorities.

Priority 1 Infestations likely to affect adjoining agricultural properties. Infestations adjacent to private property are of prime importance but other infestations may require attention, particularly in the case of declared animals.

Priority 2 Infestations not previously recorded anywhere or newly recorded in a particular area.

Priority 3 Other infestations.

- (c) Educate the public on the problems caused by declared plants and animals and obtain co-operation in prevention of establishment and spread.
- (d) Continually monitor control to assess the effectiveness of programs'.

Another submission supported monitoring of efficiency of weed control programs in all three regions. This is only mentioned in the draft Southern Forest Region plan.

The Water Authority requested liaison about weed and pest control in water catchment areas.

One submission suggested that programs are needed to control non declared weeds and pests. This submission also suggested that leaf skeletoniser and leaf miner need a high priority for research. Another submission suggested that eradication of wild pigs is a high priority as is eradication of blackberry (and suggested biological control of the latter).

## **REHABILITATION**

### **Departmental management guidelines**

Three submissions supported the aim of ensuring that rehabilitation costs are borne by the responsible agency but one stated that this should not be taken to extremes e.g. rehabilitation of major sand blowouts, which mirror natural events. One of these submissions suggested that the agency utilising the land, e.g. WAWA, should share the cost of rehabilitation. A further three submissions supported use of native species where possible. Another submission questioned why landscape architects are mentioned in strategy (v) and suggested deletion.

### **Regional preamble**

One submission noted that much of the bauxite rehabilitation of the 1960s and 1970s is of an unacceptable standard and suggested that efforts should be made to remedy this, with an outline in the management plan. Another submission criticised this comment in the Northern Forest Region plan, noting that there has been progressive treatment of some of the older rehabilitation since 1985. One submission suggested that FIRS (Forest Improvement and Rehabilitation Scheme) work should be included in the list of current rehabilitation work.

Two submissions supported greater efforts to rehabilitate degraded or regressing forest in the north-east of the Southern Forest Region. Another submission suggested that rehabilitation be given a high public profile e.g. in 'Landscape' magazine, on maps and tour brochures.

## **Recreation**

### **Departmental management guidelines**

One submission opposed charging of entry fees, another considered that charges should only be made where facilities have been provided. Four submissions supported the strategy of consultation with individuals and organisations. One of these submissions suggested that comments should be obtained from local government, community groups, Department of Sport and Recreation, tourism organisations and special interest groups. Another of these submissions suggested that there should be greater consultation with user groups. Another submission suggested liaison with tourist bureaux, tourist operators and W.A. Tourism Commission. Two submissions claimed that CALM had not consulted sufficiently in the past.



### **Regional preamble**

Three submissions suggested that the plans should give greater prominence to tourism, e.g. its economic and social worth.

Several submissions criticised the lack of reference to the Bibbulmun track in the draft plans.

### **CAMPING**

#### **Regional preamble**

One submission suggested that individual backpack camping should be allowed anywhere. The Water Authority advised that backpack camping is prohibited on all water supply catchment areas, other than at approved sites. Several submissions requested provision for overnight camp sites along the Bibbulmun track.

### **DAY USE**

#### **Regional preamble**

One submission suggested that there should be more provision of facilities for the disabled. Another submission suggested that up-to-date maps be available for each park and proposed that walk trails be designed for walkers only, so they can't be driven on.

### **MOTORISED RECREATION**

#### **Regional preamble**

One submission requested that more motorcycle areas be provided and another wanted off-road and 4-wheel-drive vehicles allowed on Yeagarup Dunes. Another submission supported the need for control over access to protect the environment. A further submission suggested that 4-wheel-drives, motorcycles and off-road vehicles be confined to areas of least impact.

### **HORSE RIDING**

#### **Regional preamble**

One submission requested that horse riding be permitted in national and State parks. Another submission suggested that approved horse riding tour groups in national parks not be unduly restricted. A further submission suggested that provision of some horse trails in the Central Forest Region should be a priority. Another submission suggested that the current restrictions on horse riding are unenforceable and they should be modified. One submission requested more control over horse-riding groups in national parks and nature reserves and another submission suggested that horses be confined to areas of least impact.

#### **Regional strategies**

One submission suggested an additional strategy in the Southern Forest Region plan, e.g. 'liaise with equestrian groups to seek co-operation in the maintenance of horse trails.'

### **PETS**

#### **Regional preamble**

One submission considered that it was essential to advertise restrictions on pets in national parks. One submission suggested that pets not be allowed on CALM land except when confined to vehicles or at camping areas. Another submission suggested that the current restrictions on pets are not enforceable and that they should be modified to make them workable. A further submission proposed that pets be allowed in national park under permit, for a fee, providing they were kept on a leash, and that there be fines for breaches.

### **SWIMMING, BOATING AND FISHING**

#### **Regional preamble**

The Water Authority recommended that the restrictions on activities outlined in the Water Resources Council publication 'Recreation in Darling Range Catchments' be reproduced in this section.

Several submissions expressed dismay at the low priority given to hunting and fishing in the draft plans.

### **Regional strategies**

One submission supported Table 9 for the Southern Forest Region but proposed that power boats be allowed on part of Lake Jasper. Four other submissions requested power boat access to Lake Jasper and one of these also requested access to the estuary of the Gardiner River. Another submission requested no camping areas on the south coast.

One submission suggested that Table 9 for the Northern Forest Region should be amended to disallow fresh water fishing and marroning in national park and State park. Another submission questioned why fishing is allowed in national park when no other hunting is allowed.

## **HUNTING**

### **Regional preamble**

One submission suggested that there be another category of land managed by CALM i.e. game reserve which be managed to enhance game species for hunting. Two submissions suggested that shooting of feral animals be allowed on CALM land. Another submission supported hunting on nature reserves designated as game reserves, in season.

## **Public Participation and Liaison**

### **COMMUNITY EDUCATION AND INTERPRETATION**

#### **Departmental management guidelines**

One submission supported the stated objective and strategies.

One submission suggested rewording the third aim as 'assist visitors in interpreting the environment in forests, parks and reserves'.

### **Regional strategies**

One submission opposed allowing public access to CALM herbaria as suggested in the Central and Southern Forest Region draft plans. One submission suggested that CALM recreation brochures be distributed by local garages, shops and hotels as well as tourist bureaux.

### **COMMUNITY INVOLVEMENT**

#### **Regional preamble**

One submission supported the strategies proposed in the Southern Forest Region plan and suggested CALM utilise volunteer programs e.g. like 'Keep Our Coast Open'.

One submission suggested that unemployed people could assist in restoring the environment.

Another submission suggested more emphasis by CALM on involvement of community groups such as friends of the park groups, for surveys and rehabilitation projects etc.

### **Regional strategies**

One submission suggested establishment of advisory committees in each CALM district as permanent liaison groups.

## **Production**

### **WATER**

#### **Departmental management guidelines - for Catchment management**

The Water Resources Council and one other submission supported the objectives and strategies presented in the draft Supporting Papers.

One submission suggested also that liaison be maintained with the Waterways Commission.

Another submission suggested expansion of strategy (ix) as follows :

'Plan recreational activities on catchments in consultation with the Water Authority. Activities will be based broadly on guidelines produced by the Western Australian Water Resources Council and as modified from time-to-time.'

### **Regional preamble**

The Water Resources Council suggested that the plans need a clear statement about the importance of water. They also suggested that the Water Authority publication (1987) 'Planning future sources for Perth's water supply' be mentioned in the Northern and Central Forest Region plans.

### **Regional strategies**

The Water Authority requested strategies in the Northern and Southern Forest Region plans similar to Central Forest Region strategies (i) and (ii) i.e.

'continue close liaison between regional and district officers of CALM and the Water Authority; as required, develop management plans for catchments jointly with the Water Authority.'

Another submission suggested an additional strategy for the Northern Forest Region plan i.e.

'(vii) seek financial assistance from the Water Authority where Water Authority policies impact on management of CALM land.'

## **HARDWOOD TIMBER**

### **Departmental management guidelines**

One submission suggested rewording the objective as follows :

'to produce the optimum yield of wood products consistent with the priority land use, social and economic needs, and the long term conservation of the forest.' Another submission suggested

that the objective should be to produce a range of wood products on a sustainable basis. This submission also suggested that as conversion and marketing will remain largely in private hands, page 45 paragraph 1 should be reworded 'to encourage efficient utilisation and marketing of wood products from the forests, favouring the highest value end products'. This submission also suggested addition of strategic economic modelling in paragraph 3 of page 45 and rewording paragraph 5, that operations would be 'fully consistent with multiple use management'.

Another submission suggested an additional aim, i.e. principle 4 from the timber strategy, ensure that 'the cost of regenerating, establishing, and managing both native forests used for timber production and exotic pine plantations will be recouped from the sale of the harvested logs;'

### **Regional preamble**

One submission suggested inclusion in the Central Forest Region plan of the paragraph on the silicon project from page 84 of the Northern Forest Region plan. One submission suggested inclusion of reference to private forest resources and their conservation and commercial values.

### **Regional strategies**

Two submissions suggested that the Northern Forest Region plan should mention five-year logging plans. One submission suggested a strategy to 'seek Water Authority funding to implement silvicultural regimes to assist water production'. The Water Authority requested liaison in developing logging prescriptions. One submission suggested a new strategy in the Northern Forest Region plan:

'(iv) provide commercial firewood resource based on resource plans developed during the life of the regional management plan.'

## **SOFTWOOD TIMBER**

One submission suggested that this section of the plan should mention private forest.

## **MINING**

### **Departmental management guidelines.**

The Department of Resources Development suggested that strategy (iii), which seeks to direct mining operations into areas where there will be least conflict with other land uses, may prove impractical and inequitable. This is because economic ore bodies are often of limited extent. More appropriate wording suggested was 'where practical seek to direct mining operations into areas of low

conflict with other land uses taking account, however, not only of environmental significance but also of economic value and developmental priorities'. Similarly, another submission suggested that the words 'where practicable' be added to strategy (iii).

One submission suggested a strategy of seeking remedy of deficiencies in the Mining Act.

#### **Regional preamble**

One submission disagreed with some of the statements in this section of the Northern Forest Region draft plan, including the statement that 'dieback disease is often spread by mining activity', which they consider lacks perspective. This submission also disagreed with the statement in the Central Forest Region plan that 'mining may cause increased salinity, turbidity or acidity of water supplies'.

#### **Regional strategies**

One submission agreed with the need to minimize the proportion of experimental areas in rehabilitation as in strategy (iv) of the Northern Forest Region draft plan. However, they consider that the figure of 5 per cent is somewhat arbitrary and unnecessarily constraining.

### **BASIC RAW MATERIALS**

#### **Departmental management guidelines**

Many shires and the Main Roads Department disagreed with the aims in this section, particularly the 5 km limit.

One submission suggested that pits should be located to cause minimum disturbance and that this might often be in road reserves as weeds are often spread into pits and their access roads. Another submission recommended that each CALM tenure should supply its own needs for gravel e.g. national park roads should be constructed mainly with gravel from national park, not adjoining State forest. One submission suggested that these guidelines mention compensation and/or royalties.

### **WILDFLOWERS**

#### **Departmental management guidelines**

One submission was in general agreement with these guidelines. Another submission suggested that licence fees be increased to \$100 and a further submission suggested \$1000 (to discourage 'sham amateurs'). Another submission agreed with the need for fees to cover costs of administration and control of commercial picking. A further submission suggested that CALM should profit from these fees.

Two submissions suggested that commercial picking be allowed on nature reserve, State park and national park, under special licence at a higher fee. However, two submissions suggested that wildflower picking be phased out from Crown land; one of these submissions suggested substantial increase in fees as a first step. One submission opposed CALM control of wildflower picking on private land.

#### **Regional preamble**

Two submissions suggested that a sentence be added to the effect that commercial picking is not permitted on nature reserve and national park. One submission suggested that licences be limited, issued regionally and be for specified areas. One submission pointed out that according to a speech by the Minister for Agriculture in 1986, the cut flower trade is now worth about \$10 million, including exports of \$3.5 million. One submission suggested that sellers rather than gatherers be licenced.

### **NURSERIES**

No public submissions

### **APICULTURE**

#### **Departmental management guidelines**

One submission suggested that strategy (i) should also take account of recreation sites and their usage. Another submission was concerned about the amount of paperwork which might be involved in strategy (iv). A further submission suggested rewording strategy (v) as follows :

'Support research into the effect of European bees on native flora and fauna and take appropriate action to protect natural values in the light of research findings.'



Numerous apiarists and honey industry submissions disagreed with the findings of the research work done to date.

A number of apiarists complained about the detrimental effect of CALM activities, particularly prescribed burning, on their operations. Numerous submissions expressed concern that apiarists were to be excluded from nature reserves, national parks and State parks and that this was not consistent with Section 99 of the CALM Act. One submission suggested that strategy (i) include progressive removal of apiary sites from nature reserve, national park and State park. One submission suggested that the guidelines should mention fees.

#### **Regional preamble**

The Honey Pool estimated the 1986/87 value of honey production as \$4.5 million.

#### **Regional strategies**

One submission suggested that there should be a strategy that no apiary sites will be allowed on nature reserve, national park and State park. Numerous submissions from the apiary industry suggested the opposite. One submission proposed that there be research by CALM, funded by apiarists, on the effect of introduced bees on native vegetation.

#### **FISHING**

##### **Departmental management guidelines**

One submission suggested that the guidelines were overly restrictive. One submission opposed prohibition of fishing where there was no demonstrated threat to species. This submission also questioned strategy (ii), regulation of use, suggesting that this may concentrate fishing, leading to over fishing. Another submission suggested that there should be liaison with the Waterways Commission.

##### **Regional strategies**

The W.A. Trout and Freshwater Angling Association suggested that an inland fishing consultative committee be formed to assist CALM e.g. assess current use, suggest restrictions.

#### **Public Utilities**

##### **Departmental management guidelines**

One submission suggested that strategy (i) be reworded:

‘liaise with government instrumentalities (such as the SEC) to ensure that public utilities are not erected on CALM land without specific approval and being aware of the requirements for CALM land.’

The State Energy Commission suggested that Strategy (ii) be as for strategy (i) from the Northern Forest Region draft plan. One submission disagreed with the objective of limiting development of public utilities; which was considered to imply bureaucratic interference. Another submission suggested that local government involvement in fire control should be covered.

##### **Regional strategies**

One submission asked for local government to be represented on any advisory committees regarding public utilities. Another submission proposed that public instrumentalities fund research into the control and reduction of disturbance by public utilities. This submission also suggested that public instrumentalities provide CALM with one and five-year operational plans of intended operations. Another submission suggested rewording Northern Forest Region strategy (ii) as ‘implement rehabilitation programs funded by the public utility causing environmental damage’.

## **9. PLAN IMPLEMENTATION**

A total of 8 submissions commented on this section.

## **LEGAL RESPONSIBILITIES**

One submission suggested that the Waterways Commission Act should be included in the list of Acts which affect CALM's land management responsibilities. Another submission suggested inclusion of the Land Drainage Act 1925 in the same section. It should be noted that this section was not intended to be exhaustive. A complete list would occupy numerous pages.

## **LIAISON REQUIRED**

One submission suggested that conservation organisations be specifically mentioned in this section. The Supporting Papers stated organisations, without specifying further details.

## **SUBSEQUENT PLANNING**

One submission commented that there was no explanation of how the management plans relate to plans and responsibilities of other Government departments. This submission suggested that the management plans should be more closely related to overall regional resource planning for the State.

## **WORKS PROGRAMS, FINANCE, PERSONNEL**

One submission made the point that additional finance and personnel is needed to implement these plans. Other submissions questioned whether CALM would have the resources available to implement the plans.

## **RESEARCH, INVENTORY AND MONITORING**

There was no direct comment on this section of the Supporting Papers. Some comments on research, inventory and monitoring have been addressed under other sections of this document. Numerous submissions criticised lack of research (or published research) in various subject areas.

## **REPORTS AND RECORDS REQUIRED**

No submissions received.

## **10. PLAN DURATION AND REVIEW**

A total of 5 submissions commented on this section.

Several submissions queried the mechanism of the planned review in 1992 including whether it would be subject to public comment.

## **11. REFERENCES**

Two submissions detected errors in the references.

## **12. GLOSSARY**

Two submissions commented on the glossary in the regional plans and suggested some additional terms to be added. One submission suggested that the Supporting Papers have a glossary.



# **PART B**

## **DRAFT STRATEGY FOR TIMBER PRODUCTION IN WESTERN AUSTRALIA**

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### **1. GENERAL**

A total of 425 substantive submissions commented on the draft document.

The comments from most submissions have been incorporated under the chapter heading to which they mainly refer. There were, however, some of a more general nature which are listed here.

The production of the document as a draft for the public to comment on was welcomed by many in their submissions.

The general thrust of the document was in some cases either totally accepted or totally rejected.

However, most picked on particular issues to comment on.

The lack of definitions was commented on in several places:

- \* strategy does not define what an efficient industry is.
- \* principle 3 would be enhanced by stating what is an acceptable standard of regeneration.
- \* should provide definition of log quality classes.

In particular the colour map (Fig. 2) was criticised for being misleading:

- \* naming of all dark green areas as conservation areas is misleading as some may yet be zoned for production.

The listing of all references at the back with no cross reference in the text was criticised:

- \* a weakness is that statements are not linked to a reference.
- \* plan should contain references in the text not just at the back of the book.

There was comment that the strategy was not a true State strategy as it was confined to the south-west.

Two submissions said the strategy should be extended to cover the wheatbelt and goldfields because of the firewood, mining, timber and sandalwood activities.

One submission wanted the strategy extended to cover plantations on the Ord River.

### **2. THE DEMAND FOR WOOD**

A total of 86 submissions commented on this chapter.

There were no submissions specifically disputing the estimates of demand given.

The majority of submissions which commented on demand asserted that CALM should attempt to control demand rather than accept it as an outside influence:

- \* tendency to think only in terms of supplying more. Should encourage restraint, efficient usage and minimal wastage.

Methods frequently cited were the need to recycle wood and paper products and substitute for wood in many products:

- \* encourage recycling of wood products, reduce consumption, use substitutes e.g. steel etc.
- \* should have recycling of paper.

These comments were usually associated with the need to reduce or eliminate logging in mature forests.

A minority of submissions noted the forecasts and agreed with them.

Westrail asked for a forecast of the likely future availability of sleepers.

### **3. W.A.s FOREST RESOURCE**

A total of 20 submissions commented on this chapter.

This chapter was purely descriptive and attracted little comment in comparison to those providing the direct proposals. Such comment as there was concentrated on the inconsistencies and lack of clarity in presentation.

Several submissions sought a more detailed tabulation of forest areas by land use. One submission noted the inconsistency in the area of jarrah forest available for production shown on pages 2 and 34.

Several submissions sought the inclusion of statements of the private pine resource to complement the State figures. More background data on volumes and growth for all species was requested.

In addition the coverage given to wandoo and marri was criticised.

Wandoo as a honey source was not given adequate consideration according to apiarists. Marri as a potential sawmill species in the native forest and in plantations warranted more research according to many submissions.

### **4. FOREST-BASED INDUSTRIES OF W.A.**

A total of 39 submissions commented on this chapter.

This chapter was again descriptive but attracted more comments.

#### **Social and Economic Significance**

A number of submissions questioned the justification and relevance of the 20 000 people employed in the timber industry.

#### **Structure of the Industry**

The Forest Products Association commented extensively on the inaccuracies in this section and suggested more accurate alternatives.

## Future Developments

The draft strategy proposed a number of initiatives in marketing which attracted considerable comment. These were, in co-operation with individual companies and industry bodies to:

(a) diversify timber products to buffer the effect of fluctuation in the housing market.

Submissions on this came from industry groups noting that the opportunity is limited and that industry has already made considerable progress.

(b) actively export W.A. produced timber products, particularly high value-added hardwood.

Industry submissions favoured the export of forest products and one submission favoured exporting to reduce Australia's Trade deficit.

There was, however, strong opposition to the export of forest products in personal submissions. These ranged from the position that no exporting should occur because:

- \* exporting raw materials will harm local manufacturers.
- \* need to protect native forests.
- \* ensure supply of our own needs now and in future.
- \* native timber should be used exclusively for domestic use.

to an acceptance of exporting of manufactured products only e.g:

- \* only export high value-added material such as furniture.
- \* no sleepers should be exported.

(c) conduct market surveys (in particular overseas markets) to assess the potential for the role of value-added hardwood products.

One submission proposed that involvement of CALM in marketing was not a role for a conservation agency as it must create conflicts of interest.

Some industry submissions saw no role for CALM in marketing, however, the FPA was in favour of ongoing surveys to check which products are more likely to be successful.

(d) Develop an economic model for industry which will identify the most profitable markets and those components of the production cycle from the stump to the sales door which are most sensitive to cost reduction.

Very little comment was received on this. What comment there was came from industry who welcomed the proposal and suggested it be made available as soon as possible.

## UTILISATION

The strategy made a commitment to increase the proportion of upgraded sawn timber from 13 per cent in 1987 to 50 per cent in 1997.

The intent of this commitment was strongly supported by the public submissions:

- \* agree, stop making low grade products such as railway sleepers.
- \* each native hardwood should make the highest value product possible.
- \* only selectively fell high quality wood for high quality uses.

- \* sell only seasoned wood.

Industry submissions, although generally agreeing with the principle, criticised the strategy for its lack of knowledge of what is happening currently in the industry:

- \* statement totally wrong, one large company already turn 60% of jarrah into seasoning stock.
- \* strategy gives little credit to industry accomplishment.
- \* CALM does not understand the system. Industry already moving positively in this regard.

One submission stated that they did not necessarily agree that the proposal was soundly based and more investigation was required.

Another submission suggested a joint CALM/industry group to establish targets and identify how they can be achieved.

There were also several comments as to the definition of what actually is a high quality (value-added) product.

Further commitments were made in this section which attracted comment. These were:

(a) To establish a utilisation research committee to further assist collaboration within industry and between the industry and the Department. To make this a subcommittee of the proposed tripartite Forest Production Council.

The Softwood Producers Association wanted to be involved in silviculture research as well because this influenced the utilisation of pine logs. The FPA wanted to be more closely involved with the Harvey Wood Utilisation Research Centre and gave a proposed structure to achieve it.

(b) To amend the CALM Act so that the Forest Production Council will include industry, trade union and Departmental representation.

Several submissions requested this body also include a conservation representative.

Another submission contended that the Executive Director of CALM being a member of the NPNCA and the FPC as a conflict of interest, as the FPC controls logging.

The AFDI submission requested a representation from their body.

Two industry submissions suggested restructuring of the FPC to a task-orientated body similar to the Forest and Forest Products Industry Council.

(c) To investigate the potential for the formation of a marketing syndicate, or co-operative to market hardwood value-added products.

Industry submissions were opposed to CALM involvement in marketing. They believe CALM should encourage industry to develop marketing further.

(d) To, in association with other sectors of the timber industry, establish training, quality control, quality assurance and technical advisory services.

One submission opposed any further control claiming it was already covered by adequate standards.

Industry groups welcomed CALM's involvement so long as it was in association with industry. The W.A. Timber Industry Training Committee submitted that it should be identified as the prime training resource with all development coming under its umbrella.

## 5. FOREST MANAGEMENT

A total of 171 submissions commented on this chapter.

### Land Use Allocation

See comments on Regional Management plan for this section.

### Multiple Use

The concept was generally supported but from different perspectives. One submission agreed with Multiple Use Management and considered it should be applied across all land tenures so that logging on conservation reserves could occur.

Other submissions commented that the plans were a move away from multiple use management to single use management.

### Sustained Yield

The concept of sustained yield was supported, but the majority of submissions commenting on this doubted CALM was actually achieving sustained yield or could not find enough information to check if it was. Typical comments were:

- \* information not clear to prove it is sustained.
- \* agree with sustained yield.
- \* karri is being overcut on a volume and area basis.
- \* the graphs and tables are inconsistent and show sustained yield is not being achieved.
- \* not clear how CALM calculates sustained yield. Does CALM consider only first grade logs?
- \* should reduce the cut so no more mature wood is cut than produced each year.

Several submissions queried whether the impact of fire, disease and mining had been taken into account in the calculations.

### Tending the Forest

#### THINNING OF HARDWOODS

The timber strategy made a commitment under this heading to improve productivity of the forest by thinning 4 000 ha of regrowth jarrah and 2 000 ha of regrowth karri.

Here again comment was highly polarised, whereas industry submissions were in favour e.g:

- \* highly commended.
- \* strongly support efforts to make forest more productive.

The majority of the personal submissions were opposed or wary of the commitment with comments like:

- \* no information as to whether the techniques used or the intensity is harmful to conservation issues.



- \* more research required before intensive forestry is implemented.
- \* opposed to intensive management that would make plantations out of native forests.

Some submissions were more opposed to the method of thinning than the thinning itself.

In particular the use of herbicide was strongly commented on:

- \* object to the use of poisons.
- \* what are the long term consequences of the use of poisons?

Others considered thinning as a waste of future resource while some submissions wanted more information and references to back up the claims about thinning.

### **FERTILISATION OF HARDWOOD**

A commitment was made to develop commercially viable fertiliser regimes for jarrali and karri by 1992.

Again comment was polarised with industry and some personal submissions supportive e.g:

- \* strongly support efforts to make forest more productive.

However, the bulk of personal submissions were opposed to fertilisation for environmental reasons e.g:

- \* oppose because of effect on soil microorganisms.
- \* object to fertilisers, they are a threat to rivers and wetlands.
- \* no indication is given as to whether the effect of fertiliser on ecosystems e.g. flora/fauna, food chains, nutrients in streams, has been studied or will be considered.

and for a perceived lowering of wood quality:

- \* it will produce poor quality timber because of rapid growth.
- \* what research or testing is envisaged on the effect of fertiliser on durability of distribution poles.
- \* fertiliser may result in spongy wood.

### **Logging**

Logging received substantial comment in the majority of submissions.

The strategy's proposal to extend integrated logging through out the hardwood forest was looked upon favourably (except by those who wanted a substantial decrease in logging - see later):

- \* agree, in principle with integrated logging.
- \* fully support integrated logging.

However, the strategy indicated a commitment for CALM to take control of logging and the associated road construction by making the logging contractors contract to CALM rather than the mill owners. While a minority saw this as a positive initiative the vast majority of submissions were from people involved in the industry who were opposed to it on four major grounds:

### **Philosophical**

- \* CALM taking over logging runs counter to smaller more efficient Government.
- \* leave logging and roading to experts, CALM should contain itself to growing wood.

### **Efficiency**

- \* if CALM took over costs would be so high it would kill the industry.
- \* don't believe CALM can do it efficiently.
- \* doesn't believe CALM could do it any better.
- \* believe it will lead to increased costs, more investigation required.
- \* oppose, CALM already has enough control, the draft timber strategy states that the operation is already efficient.

### **Employment**

- \* worried that contracts would go outside the district.
- \* oppose take-over of logging and roading due to loss of local jobs to outside contractors.
- \* there will be a loss of social values to the south-west if outsiders get contracts.

### **Safety**

- \* believe CALM tenders will lead to acceptance of the cheapest price and safety will be compromised.
- \* oppose, will result in cheap unsafe roads

The timber strategy attracted many comments on forest management practices associated with logging. By far the most common was the aspect of clearfelling. Substantive comment opposing clearfelling outnumbered those in favour by at least 10 to 1. Reasons given were:

- \* stop all clearfelling now to save the ecosystem.
- \* (clearfelling) is bad because it converts mature forest to even-aged regrowth.
- \* oppose clearfelling it is environmentally damaging.
- \* oppose clearfelling because of loss of habitat trees.

Supporters for clearfelling favoured it because of waste management:

- \* clearfelling in karri must continue because of waste in the selection system.

Coupe size received comment e.g:

- \* coupes in karri and jarrah are far too big.
- \* coupes in karri too large, should be less than 40 ha.

Some submissions sought more detail claiming they needed to know the logging plan to make real comment.

One submission stated that no mention was made of pre logging surveys which they considered essential.

The disparity in planning logging in the three regional plans was commented on. Whereas the Southern Forest Region has four-year plans no mention of such plans is given for the other regions.

Many of the pro forma submissions and a few of the substantive submissions opposed the permanent commitment of wood production as a use for native forest:

- \* it places profit before environment, assumes maximum exploitation.

One submission requested information on the continued commitment to establish exotic eucalypts for distribution poles in karri areas.

## **Pine Plantations**

### **ESTABLISHMENT**

The strategy proposed to plant 1 000 ha in the Albany Region, 500 ha in the Southern Forest Region, 500 ha in the Central Forest Region and to cease planting in the Northern Forest Region.

Industry submissions favoured the thrust of the program but were worried by the figure i.e:

- \* has been reduced from 3 250 ha to 2 000 ha.
- \* not enough being planted in the Central Forest Region.
- \* the Southern and Albany resource will not benefit the existing industry.
- \* assume that there will be a second rotation in the northern plantations.
- \* the existing planting rate in the Central Forest Region should be maintained.

On the other hand some personal submissions were totally opposed to pine establishment e.g:

- \* softwoods are inferior and not worth planting.
- \* get rid of all pines they smother the earth.
- \* should stop planting forthwith it destroys the soil.
- \* get rid of pine trees and replant with native trees.

While others opposed it in certain circumstances:

- \* there should be no pines on native forests.
- \* opposed to the purchase of farm land for pine forests.

Several submissions were opposed to pines because of the perceived health and environmental risk associated with the use of fungicides in the processing industry.

### **THINNING**

The only substantive comment on this related to a query that as sawlog production was dependent on thinning and as thinning was dependent on sale of residues 'Would increased cutting of hardwood ensue if thinning markets could not be found?'

## **Private Forest Management (Softwood)**

The strategy made a number of commitments under this heading:

'to provide a technical and management service (operating on a user pays principle) to private plantation owners.'

Submissions favoured this proposal but emphasised that there are private consultants around and CALM should compete commercially:

- \* must compete commercially with private consultants.
- \* support the proposal so long as it is voluntary.
- \* support, but CALM must compete commercially.

'The Department also proposes to investigate the potential to co-ordinate on a voluntary basis the sale of logs from private plantations.'

This proposal was supported by the Forest Products Association because of CALM's dominant role in the market, hence the dependence on CALM of private plantation owners to develop their plantations through market access of thinnings.

One submission opposed the commitment on the grounds that it would lead to monopolistic control of resources.

## **Private Forest Management (Hardwood)**

The strategy proposed

'to undertake an inventory of private hardwood forests.'

This received support from the few submissions that commented on it.

'to provide advice to private property owners on silvicultural management of hardwood forests.'

Again this was positively supported.

'to investigate the potential to introduce a hardwood sharefarming scheme based on the same principles as the existing softwood scheme. And in co-operation with private forestry companies encourage where appropriate planting of hardwood trees on private property.'

These proposals received very strong support for a variety of reasons. Some saw it as a means to ease the pressure on native forests i.e:

- \* millers should plant their own trees.
- \* yes, plant trees first then cut them down. Must preserve native forests.

While others saw potential environmental benefits i.e:

- \* strong support, should be planting for salinity control, shelter belts, soil erosion and aesthetics.
- \* fully support for fight against salinity.

Several submissions wanted the idea extended to the Ord River and a number wanted specialty timbers included.

Several submissions considered the scheme should be extended to include agroforestry.

One submission considered CALM should be more forceful with regard to private lands, particularly in the wheatbelt where it was suggested woodlands and parklands plus strips 100 m either side of all rivers be established.

Opposition was limited but one submission opposed it for the Manjimup Shire because CALM was already the biggest landholder and this would occupy valuable agricultural and horticultural land.

One submission expressed concern with regard to the water usage of tree plantations and its effect on agricultural and town supplies.

CALM proposed to contract with 'private property owners to log and sell timber products from private hardwood forests on their behalf.'

The little comment on this was all favourable.

## **Future Forest Management Proposals**

Proposals for thinning, fertilising and establishing pine have been summarised previously. The strategy made two further commitments here which received comment.

All submissions recognised the value of one commitment:

'immediately initiating a comprehensive inventory of the jarrah forest and completing it by 1990.'

- \* a good initiative.
- \* strongly support for all species.
- \* agree with the need to inventory.

Quite a few used this to comment on its ramifications i.e:

- \* was there no inventory before?
- \* should have been done before the plan was produced.
- \* should be no change to cutting rates until the inventory is completed.
- \* implies CALM doesn't know enough about the resource.

One submission wanted the inventory extended to a five-year review of all timber resource to find out its full extent.

Comment on the other commitment:

'karri and jarrah growth models which will permit the derivation of optimum thinning regimes for regrowth karri and jarrah stands will be developed by 1988.'

highlighted its need i.e:

- \* welcome the upgraded jarrah inventory but must be accompanied by upgraded growth modelling.
- \* support the growth modelling proposed to predict future resource by volume size, product quality and class.

One submission commented on the implication of not having a growth model currently:

- \* timber strategy depends on assumed growth rates but there are no jarrah or karri growth models.

and another doubted CALM's ability to produce the models in the time stated.



## 6. THE ALLOWABLE CUT

A total of 72 submissions commented on this chapter.

Although this chapter treated the forest area in two separate regions a lot of the comments were of a general nature.

Several submissions stated that the allowable cut should have been presented as several different options for comment on.

Others wanted the document to highlight the difference between this cutting strategy and that proposed in the Forests Department's General Working Plan No. 87.

There was strong feeling that the allowable cuts were too high e.g:

- \* sawlog cut planned to exceed sustainable yield.
- \* cut should be reduced much quicker than in the tables.
- \* allowable cut should be reduced to proposed 2037 level.
- \* disagree with increase in cut since GWP 87.
- \* need to have more unallocated resource.

There was a minority of submissions that opposed the planned reduction in cut:

- \* hold jarrah cut the same until inventory results are known.
- \* leave jarrah cut as it is to protect employment.

Two submissions considered the compensation for the reduction in the cut excessive:

- \* compensation of 100 000 m<sup>3</sup> for 15 000 m<sup>3</sup> is excessive.
- \* support the reduction in the cut but the compensation is excessive.

While others considered that the compensation of short logs was not practical as they were not millable.

The tables on log volumes being produced received comment such as :

- \* allowable cut of small karri logs exceed potential increment of regrowth stands.
- \* why are marri logs exhausted after 2035.
- \* hard to accept that there will be no marri and second grade logs after 2046.

The proposal to base the allowable cut on the volume of logs of all qualities rather than first grade logs only was supported but one submission queried the material left behind and burnt in coupes:

- \* in calculating the volume of logs removed has allowance been made for the material burnt in regeneration fires, left to rot, killed by silvicultural treatment etc?

Several submissions suggested that periodic reviews of the allowable cut are necessary but that there was no indication in the document that this would be done .

Road, river and stream zones received comment in this section. There was strong feeling that there should be no logging in them.

One submission requested a similar system be introduced into the Central and Northern Forest Regions.

## **Residue**

The question of the production of chip logs in the allowable cut received as much comment as any other section of the strategy. This is a controversial area and submissions were widely divergent. The timber industry submissions and pro formas supported the continuation of the project on the grounds that it earned export income, was not damaging to the environment, provided jobs and helps regrow karri forests.

Support was also present in the substantive submissions:

- \* jarrah should be chipped as well to save it being burnt.
- \* support licence renewal (WACAP) to use forest waste.

The majority of substantive submissions opposed the use of native forest for woodchips because of the following reasons:

### **Environmental**

- \* should be no woodchipping because of salinity, turbidity, erosion, aesthetics and habitat destruction.

### **Philosophical**

- \* against woodchipping in native forest.

### **Utilisation efficiency**

- \* consider sawlogs going to chips, should be a true waste industry.
- \* opposed, should only use sawmill waste and plantation grown wood.
- \* opposed to present level of woodchipping. Should be reduced markedly to ensure WACAP don't chip sawlogs.
- \* oppose woodchipping as it is a deplorable use of the State's resources.
- \* opposed to use of timber for paper manufacture.

## **Allowable cut of softwood (pine)**

The allowable cut of softwood attracted few comments compared to hardwood. Those that were made were from industry highlighting uncertainties or queries e.g:

- \* Figure 7 yields are inconsistent with the text, too low.
- \* projections of pine yield should be more detailed after the year 2000, that is include Albany Region and Southern Forest Region.
- \* should show projections for the next 30 years.
- \* concerned at the 96 000 m<sup>3</sup> figure as yield for 1987. This is not the case, does it make all other figures invalid?
- \* significant differences between strategy and previous publication, Future Timber Supplies, is of concern.

## 7. ALLOCATING THE TIMBER RESOURCE

A total of 121 submissions commented on this chapter.

Here the strategy made very clear commitments with regard to the proportion of resource that would be allocated to sections of the industry and the conditions under which the sections of the industry would get the resource.

Taking the proposed system of tenure categories of sawlogs, comments were directed at the following main areas.

The percentage break up: many submissions commented that the percentage (5 per cent) allocated to free market auction was too low to be of any real value:

- \* 5 per cent free market not enough as major mills will have the buying power to pay top prices.
- \* auction the lot to increase efficiency.
- \* worried that big companies will outbid the little ones and get all the auction wood.
- \* worried that big companies will inflate prices long enough to kill small ones.
- \* 5 per cent auction amount is too small to influence market.
- \* propose a complete free market system of auctions of small parcels on bush landings. Need this to break the entrenched favourable treatment of big companies.

There were, however, a lesser number who took an opposite view:

- \* support only a small amount of auction because large scale tendering favours the large companies.
- \* tendering for salvage wood OK if parcel size is worthwhile and has enough good quality logs in the parcel.

Several submissions believed the auction system was acceptable so long as the large mills were precluded from the auctions.

A significant section of the industry opposed the proposal altogether saying:

- \* existing allocation is fair because it has developed through the free market.
- \* recommend a single tier system where full resource be allocated in proportion to existing intakes.

The proposal to implement legally binding contracts for the stated periods was greeted appreciatively by industry with comments such as:

- \* strongly support contracts of sale compared to annual licence.
- \* supports security in resource allocation by binding contracts.

There were, however, many who saw problems with the proposal to give security of resource. These were:

- \* there should be no long term contracts.
- \* oppose 10-15 year contract of supply to major mills.

- \* opposed to long term contracts as it locks the State into paying compensation if environmental conditions dictate closure is necessary.

The proposal to include second grade logs in with the first grade logs allocation system was commented on unfavourably as it was seen to decrease mill efficiency and profitability.

The proposal to include 10 per cent of first grade logs in each parcel of salvage logs received strong criticism from industry groups as they saw it going against the major principle of the strategy to foster value-adding of sawn material e.g:

- \* opposed because value-adding will suffer.
- \* opposed because salvage log buyers put their sawn material on the green market.

Some, however, were worried that it would still not make the parcel of logs attractive enough due to the downgrading of the log standards in general.

The forfeiture of unused resource was commented on by some timber industry submissions. One submission proposed an alternative formula.

## Hardwood residue

The strategy made a number of commitments under this section i.e.

‘subject to WACAP licence renewal, to maintain supplies of hardwood to WACAP at existing levels.’

As reported earlier there were large numbers of submissions for and against the project.

Submissions were generally very polarised.

Some people commented solely on the allocation to WACAP. One submission was worried about the long term commitment to WACAP:

- \* the long term (15 yr) commitment to WACAP could risk establishment of a pulp plant in the future because of lack of resource.

The strategy proposal:

‘Provide for CALM to be responsible for the delivery of all residue material from Crown land to the woodchip mill.’

received very little comment which was evenly divided between those who saw it as a beneficial move to those who opposed it as an intrusion into free marketing.

‘Amend the Agreement Act so that the company is required to accept from CALM either logs, sawn residue or processed chips from sawmillers or private contractors at prices subject to negotiation with the company.’

Industry submissions opposed this saying:

- \* some material only provided price is no higher.
- \* how can bona fide negotiations take place if WACAP is required to accept material.

Other submissions of equal numbers saw it as positive:

- \* agree with proposal should be beneficial.

- \* needs action, WACAP pay only 1/8 for resource from private property clearing compared to State forest resource.

The strategy undertook to:

'Provide for an annual review of the royalty for woodchips.'

Again submissions were polarised into those from industry who saw a variation on the present as the best i.e:

- \* have 5-yearly reviews taking into account change in other hardwood royalties and changes to the FOB price of chips.
- \* institute a variation formula related to market fluctuations and foreign exchange increments with a general review every five years.

to those who saw the annual review as a positive move.

The strategy also suggested discounting the royalty for residue currently left after the final operation to make its extraction financially viable.

This was supported although one submission requested further information and another suggested it be extended to pine logging as well.

## Minor Forest Products

The proposed allocation system for minor forest produce drew considerable comment.

There were many submissions from people seeking to further promote the use of wood for craft work. In general the thrust of the comments was to support the new craft licences:

- \* after final operations there should be no restrictions on size or length of craftwood recovered.
- \* support the craftwood licence system proposed.
- \* suggests wood left after logging in clearfelled coupes be set aside as a resource for woodcraft.

Others, however, considered it should go further:

- \* woodcraft industry should be given first entry to forest, not after logging.
- \* give fine woodcraft people first use of a coupe so that specialty timbers are not destroyed by the main logging activity.

Firewood received considerable comment.

The Solid Fuel Merchants Association said the strategy's estimates on demand were grossly underestimated.

Many criticised the current situation such as:

- \* designated firewood areas need to be better advertised and their use insisted upon.

And the commercial operators were worried about the extent of private collectors selling wood collected free suggesting the public should be charged a royalty.

Commercial operators suggested the formation of an industry council of CALM, woodcutters and woodyard operators to determine commercial operating procedures.



The Solid Fuel Merchants Association also noted the need to have dry firewood for the new solid fuel heaters compared to open fires which could tolerate green material.

The proposed licence system for all minor forest produce based on tenders or auctions drew considerable opposition on the grounds that the scale of operation envisaged went against traditional minor forest produce operations e.g:

- \* opposed to tender system, stockpiling will degrade the resource.
- \* volumes too large for individuals.
- \* oppose elimination of farmers getting their own fence posts. They have the equipment and not being allowed to use it will increase costs.
- \* oppose the fence post proposal.
- \* opposed to small operators having to obtain supplies from contractors, unreasonable prices likely to be charged.

A minority supported the tender system with suggested modifications:

- \* need to state that the licences will be re tendered or auctioned on expiry.
- \* principle accepted provided bona fide farmer requirements for posts are excluded.

### **Allocating the resource (hardwood)**

The strategy proposed seven major mills in the south-west. This was criticised by industry submissions:

- \* industry should decide where processing works are located, not the Government.
- \* should allow industry to decide the number of mills and their location.

and in many pro formas from mill workers who believed their particular mill would have to close down because of it.

The proposal to allocate 50-90 per cent of their intake on contracts to major and medium mills and 50 per cent to salvage mills received considerable comment.

A lot of comment was sectionalised seeking better conditions for that section e.g:

- \* medium mills contracts should be 5 to 10 years not limited to 5.
- \* 50-90 per cent may make mill unviable, especially with second grade logs.
- \* allocation to salvage mills unfair to those who have not been obtaining significant supplies off Crown land.
- \* full resource should be allocated to existing mills.

A minority were happy with the proposed system:

- \* allocation method seems sound.

A large number of submissions rejected the proposed allocation system.

A recurring theme in those submissions opposed was a system of allocation based on sawmill efficiency:

- \* allocation should favour mills with good recovery.
- \* strategy discriminates against small mills. Allocation should be on the basis of a company's ability to get recovery.
- \* sawlog allocation should favour the mills that get the best recovery.
- \* should have lots of small efficient operators in open competition.

In addition the strategy proposed to provide by tender up to 30 000 m<sup>3</sup>/annum of high grade logs for jarrah and karri furniture manufacture.

This proposal was universally criticised:

- \* opposed, all mills should be integrated because of efficiency and lack of homogeneity of logs.
- \* all logs have a range of wood quality in them. High grade material should be produced from all logs.
- \* not sensible, these logs are already going into high grade products.
- \* may harm existing mills viability by creaming off the good logs.
- \* will cause negative social effects in the south if special mill built in metropolitan area.
- \* should not go to any special mill because all mills should be cutting this.

## Allocating the Resource (Softwood)

Three submissions commented on the propriety of revealing corporate information:

- \* details of corporate activities should not be in the strategy apart from CALM obligations to supply resource.

Support for the method of allocation of softwood resource was common although a number queried the suggested minimum intake (60 000 m<sup>3</sup>) for a viable mill in the future:

- \* should be a provision for smaller specialised mills with proven ability to process pine.

The Softwood Producers Association were concerned about future resource estimates and suggested a careful reassessment before any more commitments are made.

One submission wanted the private pine resource included to give a total picture and one submission noted the strategy's comment on the inability to process the *P. pinaster* resource and suggested it be put up for a call of expressions of interest.

## 8. PRICING LOGS FROM STATE FOREST

A total of 55 submissions commented on this chapter.

The pricing of logs (royalty for hardwood and stumpage for softwood) received wide comment in submissions. These are most conveniently handled by categorising them into

General  
Softwood  
Hardwood

## General

A number of submissions from industry believed it was inappropriate to have such an extensive and detailed coverage of the royalty issue in a document such as this.

Some industry submissions were concerned as to what royalty payments were funding:

- \* royalty should not be used in non productive management.
- \* forest industries should not subsidise conservation activities through royalty payments.

One submission believed firewood price should be raised to the level of chip log royalty while another commented on the need for royalties to reflect the relative value of products obtained from different logs.

## Softwoods

Most comment on softwood stumpage came from industry whereas most public comment on the pricing of logs was in relation to hardwoods.

Industry submissions accept the method of calculation of pine stumpage but consistently raised two points:

It is a cost plus system

It is CALM's responsibility to ensure its management costs are as efficient as possible because inefficiencies are passed on as higher stumpages.

One submission provided a breakdown of costs suggesting CALM's production costs were higher than other States.

The method of determining the differential price for log quality was inappropriate:

- \* log grading system inappropriate. It must be based on real log quality not the one price.
- \* age of tree or a thinning/clearfell distinction is not a realistic method of classifying logs for stumpage purposes.

One submission proposed an alternative system while another suggested a joint task force to consider the problem.

## Hardwood

The vast majority of comments on log pricing related to hardwood royalties.

Broad topics of comment were the method of calculation and the adequacy of the existing amounts.

### The method of calculation

In the strategy CALM outlined their 'cost of growing' approach. Industry submissions in the main opposed this saying:

- \* disagree with cost of growing it, should be cost of replacement.
- \* method of calculation inappropriate, price should be negotiated.

The use of auctions as a substitute was also commented on unfavourably:

- \* auctions not the answer as big companies will force the price up to protect their investment.

There was some support for the strategy's position:

- \* vital the grower recovers growing costs.
- \* timber royalties should reflect the inherent value of the forest and their full replacement cost.

and one industry submission saw a need for closer understanding of CALM's position:

- \* conversion industry must gain a clear picture of Government costs in forestry.

While another believed the royalty should be based solely on the log quality:

- \* royalty should be based on the percentage of utilisable timber in the log.

On the question of the appropriateness of the current price levels comment was distinctly polarised according to industry, individuals working in the industry and the general public. Industry submissions believed royalty payments were already high enough:

- \* royalty now high enough to cover industry involvement. Any further increase will affect company viability.
- \* enforcement of larger royalties may not be in the best long term interests of the community.

and a number of submissions sought consideration of the other benefits the industry provides in the royalty amount.

- \* royalty should be tempered by the cost of instituting CALM proposals.
- \* royalty should be negotiated taking into account the social benefits accruing from the individual mills operation.

The majority of public comment believed royalty levels were too low and recommended increasing them, usually for the reason of encouraging resource use efficiency:

- \* support a higher royalty to combat waste.
- \* agree with increased royalties.
- \* appropriate royalties will encourage the conservation of scarce resources and facilitate expansion of afforestation programs.

One submission, however, saw a different reason

- \* should be based on industries' ability to pay. They are making huge profits and capable of paying higher royalties.

Going further, a number of submissions recommended that royalty levels be based on a mill's ability to recover sawn timber from a log:

- \* royalty should be influenced by recovery.
- \* cheaper prices for better recovery.

As if anticipating this one industry submission made the comment that:

- \* higher royalties do not necessarily achieve higher utilisation. This will only occur if the cost of achieving it is more than offset by the return on the sale of the higher value output.

# APPENDIX 1

## SUBSTANTIAL SUBMISSIONS

(Note that some submissions were signed by more than one person or prepared by more than one group and many individuals and groups put in more than one submission. Names of some submitters were indecipherable. Submissions that have identical wording to pro formas, have been counted as pro formas and are not listed below).

### Government

Agriculture Protection Board of WA  
 Australian Heritage Commission  
 Commonwealth Scientific and Industrial Research Organisation  
 Department for Sport and Recreation  
 Department of Local Government  
 Department of Resources Development  
 Forestry Commission of N.S.W.  
 Main Roads Department

South West Development Authority  
 State Energy Commission  
 State Planning Commission  
 Water Authority of W.A.  
 W.A. Department of Agriculture  
 W.A. Museum  
 W.A. Tourism Commission  
 W.A. Water Resources Council  
 Westrail

### Local Government

City of Cockburn  
 City of South Perth  
 City of Wanneroo  
 Shire of Augusta-Margaret River  
 Shire of Boyup Brook  
 Shire of Bridgetown-Greenbushes  
 Shire of Busselton  
 Shire of Collie

Shire of Denmark  
 Shire of Manjimup  
 Shire of Murray  
 Shire of Nannup  
 Shire of Plantagenet  
 Shire of Toodyay  
 Shire of Wandering  
 Town of Albany

### Conservation Groups

Australian Conservation Foundation  
 Blackwood Environment Society  
 Bridgetown Friends of the Forest  
 Campaign to Save Native Forests  
 Carlotta Community  
 Carnarvon Tree Society  
 Coalition for Denmark's Environment  
 Conservation Council  
 Darradup Group  
 Dwellingup Greenbelt Committee

Leeuwin Conservation Group Inc.  
 Murdoch University Wildlife Assoc.  
 Nannup Group  
 Neighbours of the Forest, Minninup  
 River Districts Association, Pinjarra  
 The Environment Centre - N.T. Inc  
 The Tree Society  
 The Walpole-Nornalup National Park Assoc.  
 Toodyay Naturalists' Club  
 W.A. National Parks & Reserves Association

### Timber Industry

Adelaide Timber Company Pty Ltd  
 Amalgamated Timber Products Pty Ltd  
 W. Antonovsky  
 Australian Forest Development Institute  
 Bunnings Forest Products Pty Ltd  
 Colli and Sons  
 A. Drake (Middlesex Mill)  
 Fine Woodcraft Association (W.A.)  
 Forest Products Association (W.A.)  
 J. & K. Sawmillers  
 J.K. & H.M. Kershaw - Northcliffe Sawn Timber

G.W. & N.L. Saunders  
 Small Sawmillers Assoc. of W.A.  
 Softwood Products (W.A.) Pty Ltd  
 Solid Fuel Merchants Association  
 Sprengel and Associates  
 W.J. & K. Timber Co. Pty Ltd  
 West Australian Chip & Pulp Co Pty Ltd  
 W.A. Guild of Furniture Manufacturers Inc.  
 W.A. Softwood Producers Association  
 W.A. Timber Industry Industrial Union of Workers, South-West Land Division



McLean Consolidated Pty Ltd  
Midway Sawmill  
R. & N. Palmer Pty Ltd  
K.D. Power & Co.  
G.T. & B.Y. Ryan

#### **Mining Industry**

Alcoa of Australia Ltd  
Association of Mining and Exploration  
Companies Inc.  
Greenbushes Ltd  
Griffin Coal

#### **Apiary Industry**

J. Carpenter  
Commercial Beekeepers Co-operative  
R.E. & C.J. Cook & Son  
S.C. Cook  
W. & G.M. Cook

#### **Wildflower Industry, Societies**

A. Frost, Renewable Resources  
Total Exports  
W.A. Wildflower Society Inc.  
- Eastern Hills Branch

#### **Recreation Groups, Tourism Industry**

Action Outdoors Association Inc  
Augusta-Margaret River Tourist Bureau  
(Inc)  
Country Tourism Association/W.A.  
Tourism Industry Assoc.  
Great Southern Wilderness Expeditions  
Institute of Recreation (W.A.) Inc.  
Keep Our Coast Open (KOCO) Committee  
- Manjimup.

#### **Other Groups**

Balingup Progress Association (Tree  
Committee  
Bokerup Progress Association  
Frankland & Districts Historical Group  
Hoo-hoo Club 250 (Manjimup)  
Housing Industry Association - Western  
Australian Division  
Institute of Foresters of Australia  
(W.A. Division)  
Joblink (Manjimup)  
Karri-D'Entrecasteaux Region Advisory  
Committee  
Liberal Party of Australia - Manjimup  
Branch  
Mt Helena Progress Association  
Murdoch University - School of Biological  
& Environmental Sciences

W.A. Timber Industry Training Cttee Inc.  
W.A. Timber Workers Union  
Wesfi Pty Ltd  
Whittakers Ltd  
Worsley Timber Pty Ltd

The Chamber of Mines of Western  
Australia (Inc.)  
Western Collieries Ltd  
Worsley Alumina Pty Ltd

Honey Bee Enterprises (W.A.)  
Specialty Foods  
Honey Pool of W.A.  
R.O. & B.A. Pollard  
K. & D. Spurge  
W.A. Farmers Federation Beekeepers Section

W.A. Wildflower Society - Nedlands Branch  
Wildflower Exporters Assoc.

Manjimup Motorcycle Club Inc.  
Margaret River Tours  
Nannup Tourist Information Centre  
Pemberton-Northcliffe Tourist Bureau (Inc)  
Perth Bushwalkers Club Inc.  
W.A. Trout and Freshwater Angling  
Association Inc.  
Western Walking Club Inc.

National Trust of Australia  
Organisation for Sensible Environmental  
Conservation  
Pemberton Apex Club  
Primary Industry Association of W.A. Inc -  
Northcliffe Branch  
Rotary Club of Collie  
Royal Australian Planning Institute (W.A.)  
Scotts Brook Fire Brigade  
Southern Coastal Progress Association  
(Dawesville)  
Speleological Group, Witchcliffe  
Speleological Research Group, Nedlands  
Sustainable Agriculture Research Institute

## Other Submissions

R.J. Adams  
M. Addison  
J.W. Aldersea  
C. Aldridge

D.G. Allen  
J.J. Amella  
J. Anderson  
S. Angel

E.M. Ansell  
M. Arcapo  
A. Ashmore

F. Bajor  
L. Baker  
K. Banwell  
D. Barber  
S. Barkes  
K. Barnes  
D. Bartley  
M.A. Barton  
R. Bartrop  
R. Bates  
P.J. Bath  
C. Beer  
A. Bell  
C. Bellanger

D. Biagioni *et al.*  
J. Billinger  
B. Bischoff  
J. Bishop  
T.A. & K.L. Blechynden  
K. Blight  
M. Blight  
S. Blow  
B.J. Blythe  
D. Boase-Jelinek  
I.H. Bolten *et al.*  
A. Bond  
T. Bonsignov  
A. Borman

T. Bowman  
J.M.B. Box  
E.C. Boyett  
G. Boyhan  
A. Briggs  
A. Brown  
D.L. Brown  
J. & M.N. Brown  
W. Bruechle  
D. Bryant  
T. Bunn  
P. Burgess  
T. Burnett  
N. Burrows

B. Campbell  
J. Caple  
L. Carruthers  
P. Catalano  
M. Cavana  
T.J. Cederman  
R.J. Chandler  
L. Chapman  
W. Chapman  
B. Cheffings *et al.*  
P. Chidgey

S. Chisholm  
W.D. Christie  
C.E. Clark  
J.D. Clarke  
J. Clema  
B. Clews  
S. Clifford  
L. Comley  
E. Conochie  
M. Copeland  
M. Copland

I.P. Cornelius  
W.A. Cowling  
T. Cox  
A.B. Craig  
R. Cresey  
J. Criddle  
J. Croft  
B. Crosthwaite  
M.C. Curti

J. Darbyshire  
S. Davies  
K.P. Davis  
S. Day  
J. de Bruyn  
R.M. Decke

G.E. Denford  
K. Devoy  
P. Dieleson *et al.*  
V. Dixon  
J. Dodson  
N.G. Dodson

M. Dooland  
C. Dorman  
T. Dowling  
L. Dunjey  
H.G. Dzubieli

H. Ebert  
P.M. Edwards  
S. Edwards  
P. Elliott

C. Ellis  
M. Ellis  
H.D. Evans  
H.O. Evans

M.G. Evans  
E. Everett

R. Farral  
J. Fennell  
R. Flood  
R.M. Foster

R. Foulds  
B. Fowler  
J.S. Fox  
W. & J. Franceschi

D. Francis *et al.*  
D. Fry  
A. Funk

K. Gamble  
G. Gardner  
N. George  
P. Gerber  
R. Germantse  
R. Gibbs  
D. Gilbert  
D. Gilbertson  
R.J. Gillman

C. Glorie  
B. Gloudemans  
J.H. & V.A. Goff  
P. Godden  
R. Gower  
M. Graham  
P. Graham  
S. Graham  
D.A. Granger

J. Green  
K. Greene  
J.T. Greenslade  
G. Griffiths  
P. Griffiths  
P. Groaden  
S. Gronow

T. Haeusler  
R. Hahnel *et al.*  
D.J. Halden  
G.G. Hall  
R. Hall  
P. Hallen  
D. Hambley  
S. Hansen  
C. Hargreaves  
A. Harman  
C. Harris  
W. Harris  
J. Harrison  
J.J. Havel

P. Hawken  
R. & J.W. Hawkins  
C.G. Hay  
P. Hayter  
G. Heberle  
J. & T.T. Hedstrom *et al.*  
P. Henderson  
I. Herford  
Q. Herold  
S. Hewett  
C. Hicks  
J. Hindle  
P. Hird  
M. Hitchins

G. Hodge  
B.C. Hoff  
E.T.J. Holman  
J. Holmes *et al.*  
P.R. Hook  
K. Hosty  
L. Howell  
L. Howells  
G.F. Hughes  
K. Hull  
R. Humphries  
K.E. & R.C. Hunter  
T. Hurst  
R. Hussey

C. Irving

D.F. James  
G. James  
D.S. & D.M. Jenkins

M. John  
P. Johnston  
A. Jones

K.G. & M.L. Jones  
T. Jones

D.E. Kaighin  
S. Kay  
S. Keall  
I. Kealley  
N. Kelly

C. Kember  
S.M. Kenworthy  
P. Keppel  
N. Keys  
R. Kidd

R. Kidd  
J. King  
P. Kovacsy  
C. Krans

P.C. & S.R. La Brooy  
B. Ladwig  
R. Lando- Holden  
B. Launer  
K.R. Layfield  
A. Lebel  
G. Lefroy

N. Leibel  
M. Leslie  
J. Lipple  
J. Llewellyn  
K. Lodge  
C. Loney  
K.C. Low

E. Lowe  
V.L.G. Luff  
D. Lunt  
A. Luscombe  
M. Lyn  
M.J. Lyons

J. MacIver  
K. MacKenzie  
J. Main  
M.J. Martin  
R. Martin  
R. Matthews  
E.M. Mattiske  
K. McAuliffe  
S. McCaig  
L. McCaw

J. McKay  
P.J. McNamara  
M. McNash  
J. Mead-Hunter  
C.A. Mellish  
D. Merrilees *et al.*  
M. Merrilees  
S. Milbourne  
K. Milne  
I. Miscamble

R.D. Mollett  
G. Moran  
C. & W. Morland  
X. Morris  
J. Morrison  
P. Moyes  
J.B. Muir  
R.R.W. Muir  
A. Mundy

S. Nannup  
C. & F. Newton  
S. Neville  
P. Noollams  
M. Nordon

H.J. Norman  
J. Norman  
R.M. Norris *et al.*  
D.K. Norrish  
R. Nowak

F. Nugent  
J. Nugent  
S. Nugent

D.A. O'Connell  
E. Oldham

J.A. Oldham  
D. Oliver

S. Own  
A. Ozsdolay

S.R. Palmer  
V. Parkes  
R. Pawley  
A. Payne  
J. Pearce

G.B. Peet  
A. Perry  
T. Pilot  
L. Pittard  
M.J. Pollitt

A. Price  
J. Prott  
F. Pryce

J. Quartermane

J. Raines  
D. Randall  
D. Rankin  
A.G. Raven  
M. Rayner  
G. Read  
S. Redapple  
S. Renfrey

J. Renshaw  
E. Reynolds  
P.A. Reynolds  
D. Rickman *et al.*  
V. Rignall  
J. Riley  
C.J. Robinson  
M.K. Rook

B. Rose  
A. Roughead  
A.C. Rudd  
J. Rundle  
C. Russ  
J.K. Ryan  
P. Ryan

V. Sammut  
G. & F. Sampson  
D. Sanders  
J.M. & A.D. Sands  
G. Saunderson  
R.D. Schaffner  
W. Schmidt  
R. Schultz  
W. Schut  
I. Sclater  
P. Seats  
H. Seeds  
P. & L. Serventy  
S. Sevier

N. Sewell  
J. Sharp  
J. Shirley *et al.*  
H. Signey  
W.T. Silcox  
D. Simmonds  
G. Simmonds  
P. Singleton  
J. Smee  
B.F. & M.V. Smith  
D. Smith  
F.G. Smith  
K. Smith  
N.A. Smith

R.C. Stanley  
S. Stanton  
A.C. Staples  
D. Steele  
P. Stirling  
C. Story  
E. Stratford  
H. Strutt  
M. Sturcke  
J.M. Styles  
P. Sundstrom  
G. Sutherland  
A. Syme  
E. Syme

J. Taplin  
M. Tenni  
K.E. Thomas  
A. Thomson

E.S. Thomson  
D. Threlfall  
J. Timms  
L.A. Todd

R. Trembath  
H. Trengrove  
S.M. Turner

E. Valom  
R. Vaile  
D. Vann

B.W. Van Den Dorpel  
K.R. Vear  
G. Velterop

J. & M. Verstegen  
G. Vogt

J. Waldock  
A.W. Walker  
K.J. Wallace  
G. Wardell-Johnson  
A.J. Warren *et al.*  
P. Warrilow  
J. Waterman  
L. Waterman  
S. Watling  
A.J. Watkinson

T. York

D. Zlatnik

J. Watts  
J. Weare  
G. Westerberg  
B.J. White  
I.F. Whiteaker  
D. & P. Wilkinson  
P. Williams  
A.J. Williamson  
B. Willis  
P. Wilmot

S. Yovkoff

A. Wilson  
G. Wilson  
P. Wilson  
R. Wilton  
R. Winn  
B. Woollams  
M. Wooding  
C. Wright



## APPENDIX 2

### PRO FORMA SUBMISSIONS

Thirty different types of pro forma letters, envelopes or cut out slips were received, commenting on the regional management plans and/or timber strategy.

#### Pro forma 1

1492 received

Supported:

- greater CALM efforts to protect W.A.'s mature native forests;
- an expanded reserve system including all of CALM's proposals, with additional areas in the wandoo, southern jarrah and karri forests;
- no permanent allocation of native forest to wood production until it has been fully assessed for its biological, recreational and heritage values.

Opposed:

- logging in forest parks/reserves;
- management of State forests primarily for intensified wood production.

#### Pro forma 2

3 received

Supported:

- greater EPA efforts to protect W.A.'s native forest heritage;
- an enquiry into W.A.'s woodchip/timber industries and forest management;
- woodchipping only of sawmill residues and resources from plantations established on already cleared land.

#### Pro forma 3

7 received

Supported:

- greater CALM efforts to protect W.A.'s mature native forests;
- greater EPA efforts to protect W.A.'s native forest heritage;
- an inquiry into W.A.'s woodchip and timber industries and forest management;
- woodchipping only of sawmill residues and resources from plantations established on already cleared land.

#### Pro forma 4

17 received

Supported:

- greater Government efforts to protect W.A.'s mature native forests;
- an expanded reserve system including all of CALM's proposals with additional areas in the wandoo, southern jarrah and karri forests;
- no permanent allocation of native forest to wood production until it has been fully assessed for its biological, recreational and heritage value.

#### Pro forma 5

5 received

Supported:

- greater Government efforts to protect W.A.'s mature native forests;
- an expanded reserve system including all of CALM's proposals, with additional areas in the wandoo, southern jarrah and karri forests;
- an inquiry into W.A.'s woodchip/timber industries and forest management;
- woodchipping only of sawmill residues and resources from plantations established on already cleared land.

Pro forma 6

547 received

Supported:

- a responsible and viable timber industry under the control of CALM;
- maintenance or increase of the area available for timber production;
- efforts to reduce the trade deficit in forest products;
- improved utilisation and value added timber production.

Pro forma 7

527 received

Supported:

- The timber strategy statement that timber production in W.A. is not detrimental to the environment;
- increase in area available for timber production, increased yields;
- efforts to reduce the trade deficit in forest products;
- security of resource for the timber industry, improved utilisation and value added timber production.

Opposed:

- manipulation of trade tariffs, royalties and charges to favour imports and timber substitutes;
- diversion of timber resource away from established operators.

Pro forma 8

140 received

Supported:

- plans to improve viability of the timber industry whilst ensuring regeneration and protection of the environment;
- log supplies to sawmills to be assured for 15 years;
- adequate supply of quality logs to companies which invest substantial funds improving log utilisation;
- timber royalties limited to realistic growing costs;
- sawmilling, processing and marketing to be done by private enterprise, forest management by CALM.

Pro forma 9

33 received

Supported forest parks.

Opposed reduction in sawmill log intake.

Pro forma 10

29 received

Opposed increased forest reserves and parks.

Pro forma 11

26 received

Opposed 'special mill' to cut only high grade logs.

Pro forma 12

17 received

Supported security of resources for timber industry.

Pro forma 13

9 received

Suggested that no more than 15% of State forest should be excluded from timber production.

Pro forma 14

7 received

Suggested that too much forest has been prohibited from timber production.

Pro forma 15

5 received

Supported:

- CALM's proposals for security of purpose for State forest;
- woodchipping and the proposed new charcoal industry;
- thinning and culling of trees in national parks and reserves.

Questioned:

- the proposed new mill to cut 30 000 m<sup>3</sup> of high grade logs;
- addition of second grade logs to sawmill intakes;
- proposed supply of short logs to existing sawmills;
- lack of royalty incentive to use low grade sawlogs;
- growing pine on land that can produce good hardwoods.

Opposed:

- setting aside too much area as national park/reserves;
- changing the existing system of logging and roading.

Pro forma 16

54 received

Opposed:

- reduction in log intakes before completion of the inventory;
- reduction in first grade sawlog intakes;
- proposed tender system for logging and roading;
- drastic increase in royalties;
- 'double buffer zones' further reducing the timber resource;
- over emphasis of areas in the Dwellingup region for recreation and tourism reducing sawlog availability;
- the proposal to have only 7 large hardwood sawmills.

Pro forma 17

7 received

Opposed:

- the proposal to have only 7 large hardwood sawmills;
- reduction in log intakes before completion of the inventory.

Pro forma 18

5 received

Opposed:

- increase in royalties;
- increase in areas of national parks.

Pro forma 19

13 received

Opposed proposed special mill to cut only high grade logs.

Pro forma 20

11 received

- the proposal to have only 7 large hardwood sawmills;
- reduction in log intakes before completion of the inventory.

Pro forma 21

11 received

Opposed CALM 'taking over' logging and roading.

Pro forma 22

12 received

Opposed proposed special mill to cut only high grade logs.

Pro forma 23

14 received

Opposed CALM taking over responsibility for logging and roading.

Pro forma 24

11 received

Suggested that the proposed new logging contract system take account of the following points:

- lowest tender not necessarily be accepted;
- code of logging practice to be conformed to by the successful tenderer;
- past performance and experience of tenderers to be considered;
- account to be taken of affect on employment in the local area;
- CALM to adopt policies to guarantee maximum safety for personnel.

Pro forma 25

92 received

Supported CALM's policy of integrated logging.

Opposed the proposal that logging contractors be employed by CALM.

Pro forma 26

93 received

Suggested that if CALM is to be responsible for log deliveries through contractors that:

- the lowest tender not necessarily be accepted;
- discussion be held with the processor to received the logs before accepting a tender.

Pro forma 27

92 received

Suggested that prior to CALM taking over responsibility for all logging road construction that CALM should consider practices which have been adopted in the past by processors and logging contractors.

Pro forma 28

90 received

Recommended that CALM make a commitment to increase resource availability by shifting some of the emphasis from involvement in processing and marketing to silviculture.

Pro forma 29

19 received

Supported;

- the marri woodchip industry;
- forest regeneration after harvesting operations;
- monitoring of harvesting to minimise environmental effects;
- priority being given to production of wood products and export dollars.

Pro forma 30

24 received

Concerned that:

- the management plans are not consistent with Section 99 of the CALM Act;
- apiculture should not be included with forest production which is deemed not to be compatible with the objectives of conservation reserves.

Note

Pro formas 1 to 5 support conservation group submissions.

Pro formas 6 to 29 support timber industry and union submissions.

Pro forma 30 supports apiarist submissions.