

Draft Forest Management Plan 2014-2023

Conservation Commission of Western Australia

Analysis of Public Submissions

on the

Draft Management Plan

April 2013

Introduction

This document is an analysis of the public submissions to the *Draft Forest Management Plan 2014-2023* (Draft FMP).

The Draft FMP was released by the Conservation Commission of Western Australia (Conservation Commission) for a 12 week public review period from 15 August to 7 November 2012. This release and the supporting actions outlined below, meet the public review requirements for the *Forest Management Plan 2014-2023* required by section 57 of the *Conservation and Land Management Act 1984* (CALM Act), and by section 40 (4) of the *Environmental Protection Act 1986* (EP Act).

The release of the Draft FMP was supported by:

- ♦ media statements from the Minister for Environment and the Conservation Commission;
- ♦ advertising in *The West Australian* on 15 August and in four community newspapers throughout the south-west during that week and the week beginning 20 August and 23 October;
- ♦ publishing the draft plan on the Conservation Commission and the Department of Environment and Conservation (DEC) websites;
- ♦ a notice of release of the draft plan on the Environmental Protection Authority (EPA) website;
- ♦ emailing over 250 stakeholders with notice of release of the draft plan, including State Members of Parliament in the plan area;
- ♦ mailing the draft plan to stakeholders;
- ♦ providing copies to 12 public libraries throughout the south-west;
- ♦ making the draft plan available from DEC regional and district offices in the Swan, South West, Warren and South Coast Regions;
- ♦ making the plan available from the State Library, the JS Battye Library and DEC's Atrium Library and Conservation Library in Kensington;
- ♦ publishing, a range of supporting information, on the Conservation Commission and DEC websites including nine fact sheets, the social and economic assessment report undertaken by URS Australia Ltd and information sheets on sustained yield and estimating native forest carbon stocks.

During the review period three public information sessions and a series of targeted information sessions with key stakeholders were held. The public information sessions were held on Monday 10 September in Perth, Wednesday 12 September in Bunbury and Thursday 13 September in Manjimup.

Representatives of the DEC also attended meetings of the seven Aboriginal Working Parties representing native title claimants in the area of the plan and the South West Aboriginal Land and Sea Council.

Analysis of submissions

A total of 5,141 submissions were received. Of these, 88 per cent reflected two pro forma submissions promoted by the Conservation Council of Western Australia (CCWA) and the Western Australian Forest Alliance (WAFA). Submissions were also received from individuals, companies, local government, government agencies and non-government organisations.

The submissions have been considered and where appropriate comments or issues from the submissions have been reflected in the *Proposed Forest Management Plan 2014-2023* (Proposed FMP). The Proposed FMP will be assessed by the EPA under Part IV of the EP Act.

Table 1: Summary table of number and origin of submissions.

Category	Number
Pro forma A	2,724
Pro forma B	1,800
Pro forma (origin unknown)	9
Individuals and companies	553
Non-government organisations	31
Local government	12
Government agencies	12
Total	5,141

Pro forma A: Conservation Council of Western Australia

Pro forma B: Western Australian Forest Alliance

Submission analysis

Submissions were reviewed to identify the comments and issues raised during the public review of the Draft FMP. These comments and issues were then assessed using the following criteria:

1. The draft plan *may be* amended if a submission:
 - a. provides additional resource information of direct relevance to management
 - b. provides additional information on affected user groups of direct relevance to management
 - c. indicates a change in (or clarifies) legislation, management commitment or management policy
 - d. proposes strategies that would better achieve management goals; or
 - e. indicates omissions, inaccuracies or a lack of clarity.
2. This draft plan *may not* be amended if a submission:
 - a. clearly supports the draft proposals
 - b. offers a neutral statement or no change is sought
 - c. addresses issues beyond the scope of the draft plan
 - d. makes points that are already in the draft plan or were considered during its preparation
 - e. is one among several widely divergent viewpoints received on the topic and the proposal in the draft plan is still considered the best approach; or
 - f. contributes options that are not possible (generally due to some aspect of existing legislation or government policy).

No subjective weighting has been given to any particular submission or comment that would give cause to elevate the importance of any submission or comment over another.

Pro forma submissions were reviewed to identify personalised comments additional to the comments made in the main pro forma. Eight hundred and forty nine (849) submissions included additional comment(s).

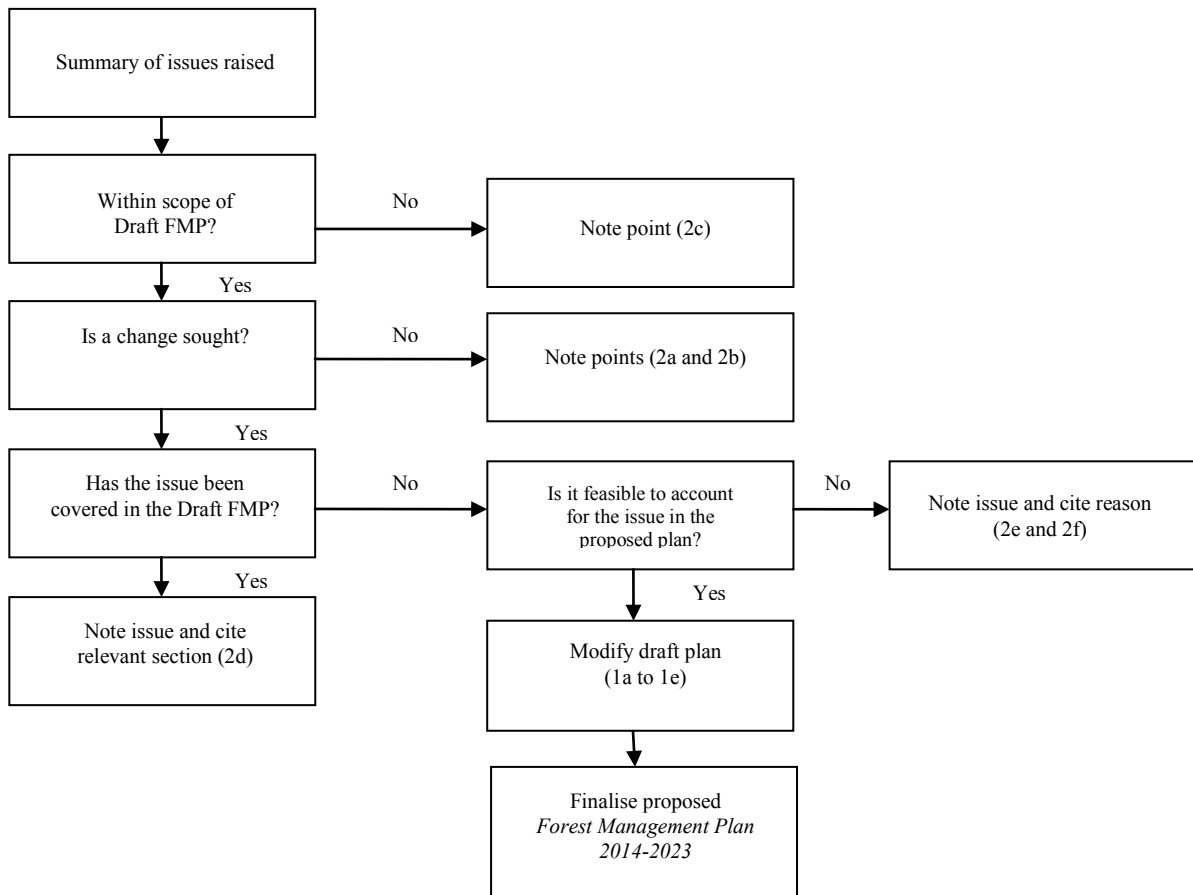


Figure 1: Analysis process

Summary of comments

Five hundred and nineteen comments were identified in the analysis of submissions received on the draft plan. These represented a wide range of community opinion. Table 2 summarises these according to Draft FMP chapters.

Appendix 1 lists each comment, the comment theme, the criterion as listed above used to assess the comment, and a response to the comment. It should be noted that comments of a similar nature from different submitters have been summarised and grouped. As such, individual submitters may not be able to find their specific comment verbatim in Appendix 1.

Table 2: Summary of comments categorised

Chapter	Number of comments
General	64
Biological diversity	108
Ecosystem health and vitality	60
Soil and water	43
Climate change and carbon cycles	38
Productive capacity	91
Heritage	17

Chapter	Number of comments
Socio-economic benefits	48
Plan implementation	28
Key performance indicators	22
Total	519

Comments received on proposed key changes and management options

The Draft FMP sought community input on a range of proposed management options associated with forest activities. The level of input received on these management options was lower than anticipated, with just over 300 comments. Where submissions did provide input, these comments have helped in preparing the Proposed FMP. The diversity of opinion on the management options reflected a wide range of community attitudes.

The proposed management options which attracted the largest number of comments related to fauna habitat zones (FHZ), (mainly opposed to the concept of FHZ), support for ‘silviculture for water production’ and support for at least the current level of allowable cut of wood products, although it should be noted that the two major proformas expressed total opposition to native timber harvesting.

Appendix 2a to 2c provides an overview of the comments received for and against the proposed changes, management options and sustained yield scenarios detailed in the Draft FMP.

Pro forma submissions

As previously indicated, the majority of submissions followed two pro formas promoted by the CCWA and WAFSA, a separate summary of the comments and responses to those proformas is at Appendix 3.

Key themes identified from submissions

The main themes with a conservation focus are as follows:

- That the Draft FMP did not follow the principles of ecologically sustainable forest management or focused too strongly on productive capacity outcomes.
- Opposed to timber harvesting in native forests for a range of reasons, including that it is not sustainable in a time of drying climate, the forest is not regenerating, it threatens fauna and flora habitat and it is economically unviable.
- The impact of a drying climate was inadequately tackled in the management objectives, including the calculation of sustained yield of jarrah and karri sawlogs.
- The option of carbon trading is not examined in the Draft FMP (nor in the social and economic impact assessment).
- Questioned the adequacy of the scientific information and background data used to inform the Draft FMP. Primarily relating to the rainfall data used and the findings from FORESTCHECK which monitors the impact of disturbance (timber harvesting, prescribed fire) on biodiversity in the jarrah forest.
- There should be a transition away from native forest timber harvesting to encouraging plantations/farm forestry.
- Opposed to mining in south-west forests.
- Supported the additions to the Whicher National Park. A number of submissions also suggested other areas for potential reservation.

- The health and resilience of native forests has been compromised by the spread of disease and threats from pests.
- Prescribed burning poses an unacceptable risk to biodiversity and ecosystem health.
- There is a lack of appropriate enforcement powers and clear governance arrangements between the CCWA, DEC and the Forest Products Commission (FPC).

The main themes with an industry focus are as follows:

- The outcomes of the Draft FMP were strongly focused on conservation outcomes.
- There is already an excess of south-west native forest ecosystems represented in the conservation reserve system, above what is required (exceeds requirements of a comprehensive, adequate and representative [CAR] conservation reserve system).
- Request to ‘open up’ some forest areas currently set aside from timber harvesting, e.g. policy inconsistency when forest conservation areas allow for mining, beekeeping and wildflower picking, but are excluded from timber harvesting.
- Supported ongoing monitoring through FORESTCHECK and those findings from FORESTCHECK present evidence that timber harvesting is being carried out in a sustainable manner.
- Opposed the concept of FHZs or if retained, the number and area of FHZs should be reduced.
- More consideration needs to be given to the social and economic consequences of reducing the allowable production levels for native forest timber harvesting reduction in the allowable logging level.
- Timber harvesting is part of a sustainable industry.
- The traditional timber towns are yet to recover from the last industry restructure.
- Alternative long-term employment options are limited.

Other major themes or comments:

- Some submissions identified editorial changes, format or style changes that will be considered in context of the proposed *Forest Management Plan 2014-2023*, should the detail of the Draft FMP be retained.
- It is important that the implementation of the final *Forest Management Plan 2014-2023* is adequately funded and resourced.
- A degree of operational fine-tuning may be required to ensure consistency between principles identified in the Draft FMP and silviculture guidelines.
- A range of comments suggested improvements to the key performance indicators.

In all there were 21 comments which were given a category 1 criterion as outlined above, and hence resulted in a change to the Draft FMP. These comments and an indication of how the Draft FMP was altered can be found in Appendix 1.

Appendix 1: Analysis of public submissions

Comment Number	Theme	Comment	Analysis category	Response
General				
1	Appendix 1	Amend Appendix 1 to include mining and resource activities under the 'key values and characteristics' column.	1e	No text has been retained in Appendix 1, in the Proposed FMP.
2	FMP	The plan is focused on extracting forest resources, not on protecting biodiversity.	2e	The Draft FMP has been developed in line with the principles of ESFM as detailed in the CALM Act, including biodiversity conservation, which is a fundamental consideration.
3	FMP	The plan overly favours environmental outcomes at the expense of the commercial operators.	2e	The Draft FMP has been developed in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses, including commercial activities.
4	FMP	Under present predictions it appears that in coming decades, as adverse impacts continue, regrowth development from both past and future logging treatments will, at the same time as diminishing ecological values, not produce the range or quality of merchantable timber aspired to by silviculturists or forest managers. This trend is already evident in the present poor sawlog yield from regrowth in the jarrah forests.	2d	The development of the range of values from regrowth forests has been considered during development of the Draft FMP and subsidiary documentation. Climate change modelling incorporating potential effects on growth rates has been used in the sustained yield calculations.
5	FMP	Protection measures in the Draft FMP compared to the existing plan are very minimalist. This makes it very difficult to avoid the conclusion that there is an implicit bias in the proposed plan in favour of yield protection over protection of ecological values despite the scale and risk of the range of threats to the forests indicated in the Draft across a range of ESFM categories. It fails two ESFM principles namely, s19 CALM Act precautionary principle and the requirement for biological diversity and ecological integrity as a fundamental consideration in decision making. The plan adopts a 'business as usual' approach which is not supported by the many pressures on south-west forests. Protection of our forests is a priority, the precautionary principle must be observed.	2e	The Draft FMP has been developed in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses, including environmental values and commercial activities. A number of proposed changes, made on a precautionary basis, seek to provide further protection of environmental values. The current FMP included significant additions to the CAR reserve system, and further additions are proposed in this plan (Whicher National Park). Formal and informal reserves, various other measures in the plan, and recovery plans and silviculture guidelines, together serve to maintain stand structural complexity and landscape heterogeneity, resilience and threatened species.
6	FMP	The draft plan seems to be based on a lot of scientific work for which the authors are to be congratulated. In revising the plan, based on submissions to the draft, I implore the authors to maintain the use of credible scientific and socio-economic information and not be swayed by vocal 'anti-forest' supporters with popularist theories.	2b	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses.

Comment Number	Theme	Comment	Analysis category	Response
7	FMP	There is no economic gain from having a ruined natural environment.	2e	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses.
8	FMP	Supports continued sustainable harvesting of all currently approved forest products with commercial, forest health, biodiversity and community values managed by professional foresters.	2b	Noted.
9	FMP	The Draft FMP does not adhere to the principles of ESFM. The FMP does not adequately address the issue of south-west forests providing vital habitat for many threatened and priority fauna species. Expresses that the Draft FMP proposes nothing positive to support forest ecosystem health and vitality. Precautionary principle should be applied when considering climate change. The next FMP should be a plan to protect native forests.	2e	The Proposed FMP is set out under the seven criteria for sustainable forest management developed in the Montreal Process (the Montreal criteria). Risk management, the precautionary principle and long term sustainability are key elements of the Draft FMP. The conservation of biodiversity and maintenance of ecosystem health and vitality are fundamental considerations, particularly in the context of climate change. The Draft FMP includes a range of measures that address these important issues.
10	FMP	Outcomes for the native forest timber harvesting industry are presented as a consequence of decisions to meet biodiversity objectives.	2e	The Proposed FMP is set out under the seven criteria for sustainable forest management developed in the Montreal Process (the Montreal criteria) and seeks to achieve an appropriate balance between various values and uses, including commercial activities.
11	FMP	The government and its agencies that have responsibility for decisions impacting on livelihoods and healthy, sustainable environments must make these decisions for the long term. Small numbers of jobs and short term economic gains do not ultimately serve the needs of local communities, the wider community or the environments they rely on.	2e	The plan has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses. It is government policy to have a sustainable native forest timber industry managed in accordance with ESFM principles.
12	FMP	WA native forests managed for diverse values, all are important.	2b	Noted.
13	FMP	Public native forests are managed for diverse values including nature conservation, tourism and recreation, water catchment protection, timber production and mining. All aspects are important, and too much emphasis on conservation has a detrimental impact on the social and economic wellbeing of rural communities.	2b	Noted.
14	FMP	The FMP 2014-2023 must balance forest values to ensure a viable native forest timber harvesting industry	2b	The plan has been developed in line with the principles of ESFM as detailed in the CALM Act, including timber production on a sustained yield basis from State forest and timber reserves.
15	FMP	The FMP 2014-2023 should include an overarching objective and outcomes associated with s55 of CALM Act (combination of purposes required to be considered in management plans for State forest and timber, conservation etc.....) and how these values are balanced. Has overarching objectives only for water and biodiversity.	2d	The plan includes an overarching goal set and various other goals under the Montreal criteria, and an additional one relating to plan implementation, and seeks to achieve a balance between various values and uses.

Comment Number	Theme	Comment	Analysis category	Response
16	FMP	The FMP 2014-2023 should pursue multiple use management objectives, including initiative of managing informal reserves.	2d	The Proposed FMP supports multiple-use in many areas, and more limited uses in some areas of State forest and timber reserves (such as informal reserves), and formal conservation reserves. Informal reserves are managed in accordance with published Departmental guidelines.
17	FMP	Supports the principles of ESFM as outlined in the plan and notes that these principles support extractive industry to the detriment of biodiversity conservation.	2e	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses. Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans, although the Proposed FMP includes several measures related to mitigating the impacts of mining.
18	FMP	The Draft FMP fails to comply with ESFM principles and hence fails to comply with the CALM Act and the EP Act.	2e	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses.
19	FMP	The EPA must reject the current Draft FMP as a proposal that, if implemented, will cause unacceptable impacts on the WA environment and the cultural and economic values associated with Western Australia's state forests.	2e	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses.
20	FMP	The Draft FMP is full of contradictions and hypothetical statements.	2e	Noted.
21	FMP	'Background' section should be omitted - "just an apology for logging".	2e	Background sections address the range of uses and values, are generally longer and more detailed in the Draft FMP and have been edited for the Proposed FMP.
22	FMP	Supports establishing a management body to oversee the availability of forest for the purpose of creating crafted wood items (commercial and hobby).	2c	The establishment of such a body is beyond the scope of the plan. Supply of craftwood is managed by the FPC.
23	FMP	FMP needs an index; avoid weasel words (e.g. page 40 'wherever practicable' should not apply to protecting habitat elements).	2d	The Proposed FMP includes a table of contents and many users will access an e-version, which can be 'word searched'. The phrase 'where practicable' recognises that operational constraints, safety issues and resourcing may have some influence on application of some measures in certain circumstances. The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. However, resourcing is beyond the scope of the plan.
24	FMP	A comprehensive forest policy covering native forests and plantations is required.	2c	The Draft FMP is consistent with existing government policy. A comprehensive forest policy (for the state) is beyond the scope of the plan.

Comment Number	Theme	Comment	Analysis category	Response
25	FMP	Helms and Warrup should not be logged, Kingston FHZ should not be logged.	2d	The key, new additions to the reserve system included in the Proposed FMP are for the Whicher National Park (and others from current and prior FMPs, other management plans, as outlined in the Draft FMP). Areas of State forest and timber reserves are available for a range of disturbance activities, including timber harvesting. An assessment of Helms block for old-growth forest is completed and the assessment for Warrup is being finalised (as at Feb 2013). It should be noted that FHZs are not available for timber harvesting during the life of the plan.
26	FMP	The plan does not have an objective. While it appears to have covered all aspects (e.g. health, sustainability, fire, socio-economic benefits, etc.) quite well, it lacks a definitive objective(s). With clear objectives the policies contained in the plan can be placed in better perspective and perhaps be more widely accepted by the community.	2d	The Draft FMP includes an overarching goal (page 16) and seeks to achieve a balance between various values and uses and includes goals within each chapter.
27	FMP	Opposes implementation of next FMP. The Draft FMP does not take account of community values. Over 5,000 people earlier this year protested clearly and strongly against further logging in the south-west forests. The community at large recognises WA's south-west forest as an extraordinary biological, social and economic asset. Community expectation is that government bodies who are playing a key role in determining the forest's future will also recognise the increasing importance of the remaining forest area and develop a plan consistent with that view. Unfortunately the draft plan fails dismally to reflect community expectations for managing our precious forest. The EPA in its last formal advice to government indicated that any new forest management plan would need to have logging scaled down dramatically.	2d, 2e	The Draft FMP seeks to achieve an appropriate balance between various values and uses. Mid- and end-of-term reports on the current FMP, community and stakeholder input and comment were considered in the formulation of the Draft FMP. In providing Report 1443 to the Minister, the EPA noted the need to take additional action to take account of threatening processes, as well as the impact of timber harvesting operations. There was no reference to harvesting being 'scaled down dramatically'. The factors impacting ecosystem health and vitality of natural areas within the area covered by the plan are identified in the Draft FMP, along with a summary of the potential consequences of climate change. A comprehensive range of measures to manage invasive species (pests, weeds and diseases) and address climate change is included in the Draft FMP.
28	FMP	The Draft FMP is a deeply flawed document that does not do what it purports to do, and is legally required to do, and instead seeks to entrench unsustainable industrial logging for another ten years in our remaining unique and biodiverse jarrah, karri, marri and wandoo forests.	2e	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses. Biodiversity conservation is a fundamental consideration.

Comment Number	Theme	Comment	Analysis category	Response
29	FMP	The EPA is formally assessing the Forest Management Plan 2014-2023 under Part IV of the EP Act. The Draft FMP has been released for public review as the public environmental review (PER) document. The following procedural concerns are identified: (1) The EPA will assess the proposed FMP. As such, the public should also be able to make submissions on the Proposed FMP. The proposed FMP should be issued as a PER by the EPA. (2) Vital data that ought to inform the EPA's Environmental Impact Assessment (EIA) is currently missing. The public needs this information in order to make informed submissions on the environmental impacts of the proposed FMP. The Environmental Scoping Document states that 'An independent review of the sustainable timber yield will also be undertaken as part of the preparation of the proposed FMP.' There has been no independent scientific assessment of the carbon sequestration capacity of the South West forests. (3) The EPA should conduct a public inquiry under Section 40(2)(c) of the EP Act into environmental impacts of the FMP 2013-2024. (4) The Environmental Impact Assessment Procedures 2010 states that submissions (with the names of private individuals removed) will be provided to the proponent. In the case of the Draft FMP submissions are being made directly to the proponent (Conservation Commission). Submissions on PER documents are usually made directly to the EPA, ensuring the confidentiality of individual submitters. This approach may have been deterred some members of the community from making submissions.	2c	Under the CALM and EP Acts, public comment is made on the Draft FMP only, with an appeal procedure available under the EP Act (on release of the EPA report and recommendations on the Proposed FMP).
30	FMP	Plan must be prepared with genuine and effective public involvement in the process (EPA report on Mid Term Audit). This includes the process to determine sustained yield.	2c	Under the CALM and EP Acts, public comment is made on the Draft FMP. Comments on the Draft FMP relating to sustained yield were referred to the Independent Panel on Sustained Yield and their report will be publicly available.
31	FMP	EPA breached procedures by allowing an incomplete submission to be released for comment.	2c	The release of the Draft FMP for public comment was approved by the Office of the EPA (as were the earlier related Referral Document and Environmental Scoping Document).
32	FMP	Supportive of draft FMP, encourages thorough consultation.	2a	Noted.
33	FMP	Primary focus on conservation in the document is admirable and generally supported.	2a	Noted.
34	FMP	Overall, this is well written, comprehensive and clear in purpose.	2a	Noted.

Comment Number	Theme	Comment	Analysis category	Response
35	FMP	Concern with 10 year limit of plan inhibiting commercial developments.	2c	The 10 year term of the FMP is a statutory limit set through the CALM Act. The term of native forest timber harvest contracts is tied, under the FP Act, to the term of a CALM Act management plan. Contract terms for other commercial activities are not restricted in this way. This issue is beyond the scope of the plan.
36	FMP	There is excessive reference to other documents that do make the FMP difficult to follow easily and consequently could well discourage broader participation by the wider community. However, I do not have any suggestions to remedy this, as the supporting documents provide important data to the overall FMP.	2d, 2e	Noted.
37	General	Consultation efforts by proponent have been inadequate, have failed to address points raised in thousands of submissions. Requests that EPA ensure independent scrutiny of process of assessment of submissions.	2e	Consultation and submissions have been considered in preparing the Draft FMP and in revising the Draft FMP to prepare the Proposed FMP. The EPA has a copy of all submissions and has considered them independently.
38	General	Numerous suggestions for rewording, clarification and minor corrections, too detailed to summarise.	1e	These suggestions were considered in preparing the Proposed FMP.
39	General	The time has passed for decisions that have net negative environmental impacts to be accepted as legitimate. We need intact, high quality forests, protected by sound legislation and supported by an informed public.	2e	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM (as detailed in the CALM Act, the Draft FMP and the Proposed FMP), and seeks to achieve an appropriate balance between various values and uses. Biodiversity conservation and protection of environmental values are fundamental considerations. Government policy supports a native timber industry managed in accordance with the principles of ESFM.
40	General	The Draft FMP has failed to satisfy the CALM Act principle to achieve the optimal yield in production by failing to identify the optimal option.	2d	This section of the CALM Act relates to wood production from plantations. Various measures relating to plantation management are included in the Draft FMP, which have been retained in the Proposed FMP, and wood supply from plantations is managed by the FPC in accordance with contractual obligations.
41	Harvesting native forest	An investigation is requested into who approved these coupes and is behind the expansion plans.	2c	The plan provides the framework for timber harvesting and for identifying the areas of State forests and timber reserves potentially available for timber harvesting. As outlined in the Draft FMP, further planning identifies which particular areas are scheduled for harvesting. Approval processes involving DEC and the FPC as set out on pages 112-113 of the Draft FMP also apply. This issue is beyond the scope of the plan.

Comment Number	Theme	Comment	Analysis category	Response
42	Harvesting native forest	Opposes the introduction of any further initiatives that unnecessarily erode the available area for managed wood fibre production in the naturally occurring native forest rainfall areas in WA.	2e	The Proposed FMP includes the additions proposed for the Whicher National Park (and others from current and prior FMPs, and other management plans, as per the Draft FMP). Various measures that seek to maintain the area of native vegetation and the area of forests are included in the Draft FMP.
43	Harvesting native forest	The Japanese protect over 60 per cent of their forests from logging.	2b	Noted.
44	Harvesting native forest	Forest logging operations are exempt from legislation to protect native species. There is no legislative basis even to enforce compliance with the FMP and no effective sanctions for non-compliance.	2e	There is a range of measures in the Draft FMP to protect native species, and timber harvesting is subject to DEC planning and approval processes. The Draft FMP includes measures to enhance compliance and failure to comply with legislation can lead to enforcement action.
45	Harvesting native forest	Logging is contrary to the EPBC Act.	2e	Forestry operations are deemed to have met Commonwealth requirements under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> for threatened flora, fauna and ecological communities (Clause 23, 24).
46	Harvesting native forest	Under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) a Commonwealth Environmental Impact Assessment (EIA) is not required for 'a Regional Forest Agreement (RFA) forestry operation that is undertaken in accordance with an RFA'. However, the current WA RFA will expire in 2019. If approved, the proposed FMP will run until 2023. This raises the possibility that the FMP 2014-2023 will be in place, while no RFA is in place, for its last four years. The State Government should refer the Draft FMP to the Commonwealth Minister for Environment in order to conduct a federal EIA under the EPBC Act for those forestry actions which will occur after the expiry of the RFA.	2d	Forestry operations are deemed to have met Commonwealth requirements under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> for threatened flora, fauna and ecological communities (Clause 23, 24). It is not considered necessary to refer the Draft FMP.
47	Harvesting native forest	Objects to an increase in logging in forests, home to threatened wildlife in the context of WA biodiversity legislation.	2d	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses. Biodiversity conservation is a fundamental consideration. Recovery plans provide for management of threatened species, and the Draft FMP includes various complementary measures to protect habitat and threatened species.

Comment Number	Theme	Comment	Analysis category	Response
48	Harvesting native forest	Stop all activities/changes, until those who are not engaged by, and/or biased in favour of the timber industry, DEC or FPC, give expert opinion on sustainable forestry practices in a WA context.	2e	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses. Biodiversity conservation and protection of environmental values are fundamental considerations. Contemporary scientific literature and a number of specialist reviews (e.g., the Expert Panel for Review of Silviculture and the Independent Panel on Sustained Yield) have contributed to the development of the plan.
49	Harvesting native forest	The forest needs old trees for nesting birds, no trees should be cut down.	2f	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses. Biodiversity conservation is a fundamental consideration. Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM. All old-growth forest is unavailable for timber harvesting. There is a range of other measures identified in the plan to maintain the availability of habitat trees and logs in areas subject to disturbance activities.
50	Harvesting native forest	Supports the Western Australian Forest Alliance (WAFA) submission.	2e	Noted.
51	Harvesting native forest	Supports WA's sustainable timber industry.	2e	Noted.
52	Harvesting native forest	Supports selective logging of all forests excluding national parks. Agrees with Forest Industry Federation of WA submission.	2e	Noted.
53	Harvesting native forest	Reduce the area of native forests available for timber harvest by 15 per cent each year to force the industry to shift to plantation timber and reduce native timber quotas by 15 per cent each year.	2c, 2f	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM.
54	Harvesting native forest	Recommends the Draft be re-written from the ground up with a focus on the rapid cessation of logging in our native forests, the science- and community-based management of the forests, and the expansion of well-managed plantations and farm forestry on previously cleared farmland.	2c, 2f	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM.
55	Harvesting native forest	The EPA must reject the FMP as it would lock in a decade of unsustainable industry leading to social, economic and ecological destruction.	2e	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses. Biodiversity conservation and protection of environmental values are fundamental considerations.

Comment Number	Theme	Comment	Analysis category	Response
56	Legislation	Requests the Western Australian Government, consistent with the approach adopted in Victoria, to amend and decouple the CALM Act and the FP Act to allow the development of a rolling Forest Management Plan process that provides greater resource certainty to the native timber industry over a longer period of time (i.e. 20 years) to encourage re-investment in the industry for greater efficiency and value-adding.	2c	This is a legislative issue which is beyond the scope of the plan.
57	Legislation	Requests a review of the prohibition against whole log exports, particularly for bole logs.	2c	The pricing and allocation of harvested forest products is outside the scope of the plan.
58	Legislation	The Wildlife Conservation Act is out dated and should be reviewed. The FMP should operate under a new updated Wildlife Conservation Act.	2c	This is a legislative issue which is beyond the scope of the plan.
59	Legislation	The EPA should require the proponent to prepare a FMP that is compliant with all relevant legislation.	2d	The Draft FMP was prepared within the framework of all relevant legislation.
60	Legislation	The Draft FMP breaches the RFA, the CALM Act, and the EP Act and must be rejected.	2e	The Draft FMP was prepared within the framework of all relevant legislation.
61	Mining	Opposes mining in production forest areas.	2c	Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans.
62	Mining	Suggested inclusion of reference to new technology and commercial activities that can be undertaken without adverse impact.	2d	The Draft FMP includes measures to encourage continuous improvement and adaptive management.
63	Mining	The framework under which exploration and mining operations (other than State Agreement Acts) is well established and should not be duplicated in the plan.	2d	Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans; the Draft FMP does not attempt to duplicate this.
64	Plantation	Divert all possible resources in turning degraded agricultural areas and crown land, into timber plantations; fund universities, TAFEs, secondary schools, local governments and land care groups to assist.	2c	This is beyond the scope of the plan.

Comment Number	Theme	Comment	Analysis category	Response
Biological diversity				
65	Biodiversity	Biodiversity and ecosystem health must be top priority for the next FMP. Considers that assumptions related to a number of critical fauna, canopy, and rainfall or "firing" (sic) problems in the FMP managed forests do not fit available field evidence. The evasion of these sustainability-critical issues should prevent a discerning FMP reviewer from signing off on this draft until after the proponent has undertaken a major and satisfactory revision of the 2012 draft that clearly describes, and convincingly and comprehensively addresses, the serious fauna retention, canopy regrowth, and rainfall linked to bio-sustainability issues and problems that are not discussed in the 2012 draft, and/or supporting literature (e.g. FORESTCHECK fails to adequately sample mammal diversity in its 'tiny footprint' cross-site habitat treatment study 2000-06). Requests that the proponent's responses to these sustainability-critical issues should be exposed to a public comment process long before the FMP gets its final sign-off.	2e	The Draft FMP has been developed in line with the principles of ESFM as detailed in the CALM Act, including biodiversity conservation and ecosystem health, which are fundamental considerations. The process of developing the Proposed FMP has involved review of existing chapters in the Draft FMP (which itself was informed by Conservation Commission mid- and end-of-term audits, corresponding EPA reports and specialist reviews), extensive review of KPIs, plus from the submissions arising from the public consultation process. Recovery plans provide for management of threatened species, and the Proposed FMP includes various complementary measures to protect threatened species.
66	Biodiversity	Urges greater emphasis on biodiversity conservation. The Draft FMP plays down the consequences of the reduction in rainfall on fauna.	2e	The Draft FMP has been developed in line with the principles of ESFM (as detailed in the CALM Act and the Draft FMP and retained in the Proposed FMP), including biodiversity conservation and ecosystem health, which are fundamental considerations. The potential consequences of climate change are summarised in the Draft FMP (page 84-86) and an appropriate, broad range of precautionary measures to address climate change is included (in various sections). Recovery plans provide for management of threatened species, and the Proposed FMP includes various complementary measures to protect threatened species.
67	Biodiversity	Supports updating policies and plans that support conservation, sustainability and biodiversity in South West south-west forests	2a	Noted.
68	Biodiversity	Australian Bittern has not been identified as a threatened species of relevance in this FMP. Should apply the precautionary principle to ensure wetland health over continued extractive industries.	2d	The Australasian Bittern is not referred to as having a recovery plan, as the listing in Draft FMP Appendix 13 includes those for which plans exist. Irrespective of this, threatened species are protected under the Wildlife Conservation Act. The Draft FMP includes measures relevant to threatened species (e.g., page 48).

Comment Number	Theme	Comment	Analysis category	Response
69	Biodiversity	Concerns about the threats to wildlife, impacts on climate and the de-valuing of the living forest resource that the Draft FMP, in its current form, will pose in the short and longer term. Please make amendments that result in a plan that will ensure better outcomes - give top priority to biodiversity and ecosystem health and vitality. Should not log native forests that are close to the edge of their climatic range.	2d	The Draft FMP has been developed in line with the principles of ESFM (as detailed in the CALM Act and the Draft FMP and retained in the Proposed FMP), including biodiversity conservation, which is a fundamental consideration.
70	Biodiversity	Should use the same assessment criteria for threatened species as used by the Commonwealth Government for other developments that impact on these (threatened) species.	2c	The Draft FMP is a CALM Act management plan under WA law. The Wildlife Conservation Act provides for declaration of threatened species using WA assessment criteria.
71	Biodiversity	The mitigation arrangements for impact on threatened species are unsatisfactory and a primary goal must be to protect and restore habitat values for threatened species.	2d	The Draft FMP has been developed in line with the principles of ESFM (as detailed in the CALM Act and the Draft FMP and retained in the Proposed FMP), including biodiversity conservation, which is a fundamental consideration. Management activities for threatened species and threats are detailed in recovery plans, and in the Proposed FMP ('Biological diversity' chapter).
72	Biodiversity	There must be thorough, detailed and independent fauna surveys conducted prior to any disturbance activities planned under the FMP, and logging should not proceed in any locations where threatened species are found to be present.	2d	A strategic approach is used to assess fauna values in areas where disturbance is proposed. The Fauna Distribution Information System (FDIS) is used to identify likely occurrence in areas planned for timber harvest and prescribed burning, along with DEC's planning checklist for site-level plans. Additional conditions (to the standard requirements of various operational guidance documents) may be imposed where threatened species are likely or known to occur.
73	Biodiversity	DEC has a conflict of interest in undertaking self-assessment of the impacts of DEC management on threatened species. It must be undertaken by an independent body. A baseline study should be carried out and repeated every two years.	2c	The Conservation Commission (an independent body) is responsible, through the agency of DEC, for development of management plans under the CALM Act, and it also has an audit role in evaluating the implementation of the FMP. Ongoing acquisition of biodiversity information is supported by various activities, including biological surveys provided for in the Proposed FMP.
74	Biodiversity	Claims that forestry is killing cockatoos are nonsense; if cockatoos are in an area being harvested they simply fly to the adjoining forest area. The real threats to cockatoos are land clearing for farms and houses, shooting and climate change, not forestry.	2d	The Draft FMP has been developed in line with the principles of ESFM (as detailed in the CALM Act and the Draft FMP and retained in the Proposed FMP), including biodiversity conservation, which is a fundamental consideration. Additional measures have been included in revised silviculture guidelines (page 42) for protecting marri trees as a source of food and habitat for cockatoos.
75	Biodiversity	Suggests the inclusion of reference to climate change (page 39).	1e	The Proposed FMP text has been amended to acknowledge climate change as a potential process that may affect certain species.
76	Biodiversity	Need to include drought induced tree collapse and frost as potential disturbance events.	1e	The Proposed FMP text has been amended to acknowledge frost as a potential disturbance activity.

Comment Number	Theme	Comment	Analysis category	Response
77	Biodiversity	Does not recognise the cumulative effects of all pressures.	2d	The Draft FMP has been developed in line with the principles of ESFM (as detailed in the CALM Act and the Draft FMP and retained in the Proposed FMP), including biodiversity conservation and ecosystem health, which are fundamental considerations. As acknowledged in the Draft FMP (page 51), impacts from various factors may be cumulative and/or interact in ways that are not always well understood. Also, as stated in the Draft FMP (page 84): Given current knowledge and uncertainties of the likely magnitude and result of changes to climate from increases in atmospheric levels of GHGs, it is considered the management activities proposed throughout the Draft plan encompass an appropriate range of broad precautionary actions. Adaptive management to enhance resilience will likely be of increasing importance and there needs to be flexibility to respond as new information becomes available.
78	Biodiversity	Plan does not reflect biodiversity richness of the south-west as being one of the world's biodiversity hot spots.	2d	This point is acknowledged in the 'Background' to the 'Biological diversity' chapter of the Draft FMP (page 29), which is retained in the Proposed FMP.
79	Forest Conservation Areas (FCAs)	Allow access to Forest Conservation Areas (FCAs) for controlled timber harvesting operations. Contradictory that these areas are available for mining and other activities such as wildflower picking and firewood collection.	2d	Government policy is that FCAs won't be available for timber harvesting. The FMP and/or area management plan may include provision for them to be available for firewood collection - as in the Draft FMP, (page 34 and as retained in the Proposed FMP).
80	FHZs	Area of FHZs should be increased dramatically. FHZs should be retained. As well as full retention of the integrated Kingston FHZ, further consideration should be given to extending the FHZ system or providing other forms of protection for parts of State forest in the Warrup block that are scheduled for intensive logging.	2e	FHZ settings have been amended for this plan, resulting in a reweighting of the allocation of area to those forest ecosystems with lower levels of reservation, a slightly greater area of mature forest in FHZs, a lesser area of regrowth forest and a lesser total area in FHZs, a greater range of size of FHZs in recognition of the characteristics of the landscape in which they are located, and the inclusion of some large FHZs in areas of known fauna values.
81	FHZs	Keep FHZs at 200 hectares each and the same total area.	2e	FHZ settings have been amended for this plan, resulting in a reweighting of the allocation of area to those forest ecosystems with lower levels of reservation, a slightly greater area of mature forest in FHZs, a lesser area of regrowth forest and a lesser total area in FHZs, a greater range of size of FHZs in recognition of the characteristics of the landscape in which they are located, and the inclusion of some large FHZs in areas of known fauna values.

Comment Number	Theme	Comment	Analysis category	Response
82	FHZs	Supports Option 2 modified (i.e. refine FHZ network but no loss of area)	2e	FHZ settings have been amended for this plan, resulting in a reweighting of the allocation of area to those forest ecosystems with lower levels of reservation, a slightly greater area of mature forest in FHZs, a lesser area of regrowth forest and a lesser total area in FHZs, a greater range of size of FHZs in recognition of the characteristics of the landscape in which they are located, and the inclusion of some large FHZs in areas of known fauna values.
83	FHZs	FHZs supported, same overall area but can have larger sizes and consolidations	2e	FHZ settings have been amended for this plan, resulting in a reweighting of the allocation of area to those forest ecosystems with lower levels of reservation, a slightly greater area of mature forest in FHZs, a lesser area of regrowth forest and a lesser total area in FHZs, a greater range of size of FHZs in recognition of the characteristics of the landscape in which they are located, and the inclusion of some large FHZs in areas of known fauna values.
84	FHZs	Supports FHZ Management Option 2.	2e	FHZ settings have been amended for this plan, resulting in a reweighting of the allocation of area to those forest ecosystems with lower levels of reservation, a slightly greater area of mature forest in FHZs, a lesser area of regrowth forest and a lesser total area in FHZs, a greater range of size of FHZs in recognition of the characteristics of the landscape in which they are located, and the inclusion of some large FHZs in areas of known fauna values.
85	FHZs	Opposes FHZs. FHZs should be eliminated from the Plan. However, if any are retained, they should not be deducted in their full volume from the sustainable yield calculations. They should not be deducted at all from the sustainable yield calculations, or at most be counted at a properly calculated level of offset. A modified version of Option 2 could be accepted as long as the volume of timber was not deducted or at least offset. Native forest timber harvesting can be expanded without affecting biodiversity values by changing/amending informal reserves network in the FMP 2014-2023 (i.e. remove FHZ, review regrowth areas in reserves, defer additional measures until they have been assessed, areas of State forest that are outstanding recommendations from the FMP 2004-2013 which have not been rededicated [22,110 ha]). FHZ locations should be restructured so there are fewer FHZs in areas where there are already high levels of reserved ecosystems.	1d	FHZ settings have been amended for this plan, resulting in a reweighting of the allocation of area to those forest ecosystems with lower levels of reservation, a slightly greater area of mature forest in FHZs, a lesser area of regrowth forest and a lesser total area in FHZs, a greater range of size of FHZs in recognition of the characteristics of the landscape in which they are located, and the inclusion of some large FHZs in areas of known fauna values.

Comment Number	Theme	Comment	Analysis category	Response
86	FHZs	Must address the potential negative effects that FHZs have on the streamside vegetation, the aquatic ecosystem, streamflow and duration of flow.	2d	FHZ settings have been amended for this plan, resulting in a reweighting of the allocation of area to those forest ecosystems with lower levels of reservation, a slightly greater area of mature forest in FHZs, a lesser area of regrowth forest and a lesser total area in FHZs, a greater range of size of FHZs in recognition of the characteristics of the landscape in which they are located, and the inclusion of some large FHZs in areas of known fauna values.
87	FHZs	Despite the current Plan nearing the end of its life, many of the proposed FHZs have not been formalised.	2d	The boundaries of indicative FHZs are finalised as part of the planning process for certain disturbance activities, in line with the 'Guidelines for the Selection of FHZs' and the 'Guidelines for the Protection of Values of Informal Reserves and FHZs'. Where no disturbance activities are identified, there is no need to finalise boundaries and therefore the process is prioritised to focus on those FHZs where disturbance activities are proposed. As at late December 2012, the boundaries of 108 FHZs had been finalised.
88	FHZs	The FHZs may save some areas from logging, but there are still no guidelines and some designated FHZs are in poor areas.	2d	FHZ settings have been amended for this plan, resulting in a reweighting of the allocation of area to those forest ecosystems with lower levels of reservation, a slightly greater area of mature forest in FHZs, a lesser area of regrowth forest and a lesser total area in FHZs, a greater range of size of FHZs in recognition of the characteristics of the landscape in which they are located, and the inclusion of some large FHZs in areas of known fauna values. Finalisation of the location of FHZs is guided by the 'Guidelines for the Protection of Values of Informal Reserves and Fauna Habitat Zones'
89	FHZs	Supports the concept of FHZs for biodiversity protection, but questions the intention to rotate these areas and the proposed timescale.	2d	FHZ settings have been amended for this plan, resulting in a reweighting of the allocation of area to those forest ecosystems with lower levels of reservation, a slightly greater area of mature forest in FHZs, a lesser area of regrowth forest and a lesser total area in FHZs, a greater range of size of FHZs in recognition of the characteristics of the landscape in which they are located, and the inclusion of some large FHZs in areas of known fauna values. FHZs can be rotated once new areas of comparable habitat value can be provided to replace those in the existing FHZs, which is most likely to occur over several decades, as provided for in the 'Guidelines for the Protection of Values of Informal Reserves and Fauna Habitat Zones'. Finalisation of the location of FHZs is guided by the 'Guidelines for the Protection of Values of Informal Reserves and Fauna Habitat Zones'

Comment Number	Theme	Comment	Analysis category	Response
90	Forest cover	Aerial photos taken in the last 60 years show over 85 per cent of our forests have disappeared in south-west WA	2d	The accuracy of the statement has not been assessed. However, the plan was developed in the context of contemporary pressures and acknowledges legacy issues. Measures to address the maintenance of native vegetation and forest cover are included in the 'Biodiversity' and 'Productive Capacity' chapters.
91	FORESTCHECK and research	Supports the mid-term audit report's recognition that further work needs to be done to investigate the links between increasingly threatened fauna and logging.	2d	The mid-term audit has informed the development of the Draft and Proposed FMPs. Research into many aspects of forest management is ongoing, and informs recovery plans for threatened taxa.
92	FORESTCHECK and research	Advocates urgent research into the effects of disturbance (fire, timber harvesting) on nesting black cockatoos. More information is needed to better manage prescribed burns in conjunction with nesting black cockatoos.	2d	The mid-term audit has informed the development of the Draft FMP. Research into many aspects of forest management is ongoing, and informs recovery plans for threatened taxa. Additional measures to provide for cockatoos are included in the Draft FMP and retained in the Proposed FMP.
93	FORESTCHECK and research	Recommends a major specialist workshop on the state of current forest ecosystems and an independent review that collates key issues from the submission and the workshop. More research needs to be done - invertebrates or fungi. DEC should make a stronger commitment to biological monitoring	2d	The Draft and Proposed FMPs state they will seek to maintain and extend the species, community and process monitoring program, FORESTCHECK. Research into many aspects of forest management is ongoing. The Proposed FMP includes a broader range of biological monitoring to support reporting on revised KPIs.

Comment Number	Theme	Comment	Analysis category	Response
94	FORESTCHECK and research	<p>It is critical that well replicated FORESTCHECK type plots are installed to start to understand how disturbance events (in particular mining, frost and drought) might impact on forest health and biodiversity and in turn inform managers and policy makers. The FMP does not appear to consider this suite of disturbances and how they might interact to adversely impact on the health of the forest and its subsequent management. Questions that might be asked under a FORESTCHECK type monitoring with regards to the mosaic and overlapping of these different disturbances should include:</p> <ul style="list-style-type: none"> • Will there be increased susceptibility and reduced resilience of the forest due to a highly fragmented mosaic of activities, large edge effects, and disturbances such as frost, drought, and mining together with logging and fire? • What will be the timing and intensity of future collapses? • What will be the impact of pests and pathogens on forest health in a changing climate • What is the impact of this mosaic of disturbances on native fauna? • What are the consequences of 'monocultures' (mining rehabilitation) on forest health and biodiversity? • Is forest resilience compromised and will we start to see thresholds being reached? 	2d	The Draft and Proposed FMPs state they will seek to maintain and extend the species, community and process monitoring program, FORESTCHECK. Research into many aspects of forest management is ongoing. The Proposed FMP recognises the potential consequences of climate change and associated uncertainties and provides for adaptive management. It also includes a broader range of biological monitoring to support reporting on revised KPIs.
95	FORESTCHECK and research	Supports continuation of the 'FORESTCHECK' initiative and that it should be extended into karri and marri with more focus on threatened flora and fauna.	2a	The Draft and Proposed FMPs state they will seek to maintain and extend the species, community and process monitoring program, FORESTCHECK. Research on threatened species is largely done outside of FORESTCHECK.
96	FORESTCHECK and research	FORESTCHECK should be independently reviewed and peer checked	2d	FORESTCHECK was established following an extensive consultation process involving a range of science institutions. Results have been published in the peer-reviewed scientific literature.
97	FORESTCHECK and research	FORESTCHECK monitoring system used by DEC has failed to assess the impact of logging on numbats, and the majority of the other threatened forest – dependent species; don't rely on FORESTCHECK. EPA requested to apply the same assessment criteria as used by the Commonwealth	2d	FORESTCHECK was established following an extensive consultation process involving a range of science institutions. Results have been published in the peer-reviewed scientific literature. Research on threatened species is largely done outside of FORESTCHECK. The Draft FMP is a CALM Act management plan under WA law. The Wildlife Conservation Act provides for declaration of threatened species using WA assessment criteria.
98	FORESTCHECK and research	FORESTCHECK results have management implications, showing that the creation of large reserve doesn't not maximize biodiversity, especially if fire disturbance is minimised	2d	The Draft FMP includes a cascading set of measures for conserving biodiversity, including formal and informal reserves, complemented by other measures, as outlined in the document.

Comment Number	Theme	Comment	Analysis category	Response
99	FORESTCHECK and research	Faulty conclusion has been drawn from FORESTCHECK. Cannot support conclusion that forest logging has minimal impact on threatened species.	2d	Research on threatened species is largely done outside of FORESTCHECK. FORESTCHECK results have been published in the peer-reviewed scientific literature. Recovery plans provide for management of threatened species, and the Proposed FMP includes various complementary measures to protect threatened species.
100	FORESTCHECK and research	Timber harvesting does not impact on species biodiversity (FORESTCHECK findings).	2d	Noted.
101	Harvesting native forest	The Plan does and will not preserve biodiversity values. CSIRO loss of biodiversity projection does not take into account the effects of continued logging of native forests in WA. DEC (or anyone else) is not aware of all the factors contributing to loss of biodiversity. New species continue to be identified and their contribution to the functioning of the ecosystem is unknown, as are the effects of logging and prescribed burning on these species. Claims that no species has become extinct because of logging activities are false because no-one knows what species there were in the forests before logging and associated burning began. Logging of native forest should not continue. Large-scale non strategic prescribed burning should not continue. The expert panel identified 'few significant impacts' of logging on biodiversity and indicated that 'most species were resilient'. This is not good enough. Some species clearly were adversely affected by logging; and even one is one too many, when so many local fauna are already endangered. Although the report goes on to say that, after 40 years, there was no apparent long-term impact, this does not necessarily mean the same would apply henceforth, given the compounding effects of climate change.	2d, 2e, 2f	The Draft FMP has been developed in line with the principles of ESFM (as detailed in the CALM Act and the Draft FMP and retained in the Proposed FMP), including biodiversity conservation, which is a fundamental consideration. The CALM Act provides for a management plan for State forest and timber reserves to have a purpose of native forest timber production on a sustained yield basis. The government has a policy of sustainable native forest timber harvesting and the Proposed FMP provides for a native forest products industry. Recovery plans provide for management of threatened species, and the Proposed FMP includes various complementary measures to protect threatened species.
102	Harvesting native forest	Logging in native forests (irrespective of their 'old-growth' status) should be reduced and ideally stopped entirely.	2e	The CALM Act provides for a management plan for State forest and timber reserves to have a purpose of native forest timber production on a sustained yield basis. The government has a policy of sustainable native forest timber harvesting and the Proposed FMP provides for a native forest products industry.
103	Large trees	Set a size limit of maximum two metre circumference for timber harvesting, and introduce a mandatory fine of \$300,000 if loggers take a tree over that size.	2e	Noted. Old-growth forest is defined in the Draft FMP as 'ecologically mature forest where the effects of unnatural disturbance are now negligible'. Only areas of forest larger than two hectares are included in DEC's database.
104	Large trees	Does not agree with the definition of 'old-growth forest (trees more than 800 mm diameter should not be extracted and sold)	2e	Noted. Old-growth forest is defined in the Draft FMP as 'ecologically mature forest where the effects of unnatural disturbance are now negligible'. Only areas of forest larger than two hectares are included in DEC's database.

Comment Number	Theme	Comment	Analysis category	Response
105	Large trees	Retention of areas of forest with communities of dominant mature trees and their exclusion from logging should be an essential element of management strategies to protect the hydrological and ecological resilience values of these trees in forest ecosystems. These ecological values include high quality mature habitat, corridor linkages, nodes of mature vegetation and landscape buffers and refugia for fauna nesting, foraging and dispersal, especially for threatened species such as the phascogale and ringtail possum.	2d	Formal and informal reserves, various other measures in the Draft FMP, recovery plans and silviculture guidelines, together serve to maintain stand structural complexity and landscape heterogeneity, resilience and threatened species. Old -growth forest is defined in the Draft FMP as 'ecologically mature forest where the effects of unnatural disturbance are now negligible'. Only areas of forest larger than two hectares are included in DEC's database. Old-growth forest is protected from timber harvesting, and the Draft FMP proposed this be the case for all disturbance activities. This is retained in the Proposed FMP. Trees of various species, ages and sizes are also retained as habitat trees as set out in the silviculture guidelines.
106	Large trees	Stop logging old-growth trees (even if they are in a 're-growth' reserve) and claiming they are re-growth; this is misleading terminology. Ensure the ongoing protection of forest ecosystems by preventing further fragmentation of areas and protect older trees.	2d	Formal and informal reserves, various other measures in the Draft FMP, recovery plans and silviculture guidelines, together serve to maintain stand structural complexity and landscape heterogeneity, resilience and threatened species. Old -growth forest is defined in the Draft FMP as 'ecologically mature forest where the effects of unnatural disturbance are now negligible'. Only areas of forest larger than two hectares are included in DEC's database. Old-growth forest is protected from timber harvesting, and the Draft FMP proposed this be the case for all disturbance activities. This is retained in the Proposed FMP. Trees of various species, ages and sizes are also retained as habitat trees as set out in the silviculture guidelines.
107	Munda Biddi Trail (MBT)	Munda Biddi Trail options. The industry is strongly opposed to any further reservation and therefore supports the adoption of Management Option 1 – no change: 'apply conditions to disturbance activities and utilise temporary trail diversions to manage temporary use conflicts'.	2e	The Munda Biddi Trail is a well recognised cycling trail, and travel routes as proposed in Management Option 2 of the Draft FMP, are included in the Proposed FMP.
108	Munda Biddi Trail (MBT)	Supports the proposed Management Option 2. Supports its long term protection and management as an internationally iconic off road cycle trail. Options differ to those which are currently in place from the Bibbulmun Track. No logging trucks should be permitted to use roads currently used by the Munda Biddi Trail. Supported subject to forestry operations in reference to the Munda Biddi Trail.	2e	The Munda Biddi Trail is a well recognised cycling trail, and travel routes as proposed in Management Option 2 of the Draft FMP, are included in the Proposed FMP.

Comment Number	Theme	Comment	Analysis category	Response
109	Munda Biddi Trail (MBT)	Options presented for the Munda Biddi Trail differ to those that are currently in place for the Bibbulmun Track. Given this inconsistency, a third option is suggested that could provide a greater level of protection and simultaneously bring the management of the Munda Biddi Trail in line with the Bibbulmun Track. Key components to include in the management option are: (i) a 400m protection zone around built components such as the trail, campsites and bridges; (ii) a 50m protection zone around existing roads and tracks; (iii) logging vehicles not being permitted on the roads that are part of the Munda Biddi Trail. The suggested management measures will help ensure that the significant investment in the Trail through Royalties for Regions will yield the maximum benefits. The proposed measures will also help protect the amenity of the trail and the safety of trail users.	2e	The Munda Biddi Trail is a well recognised cycling trail, and travel routes as proposed for in Management Option 2 of the Draft FMP are included in the Proposed FMP.
110	Munda Biddi Trail	Supports the management objective including maintaining access to these areas (Bibbulmun Track and Munda Biddi Trail) subject to forestry operations.	2e	The Munda Biddi Trail is a well recognised cycling trail, and travel routes as proposed in Management Option 2 of the Draft FMP, are included in the Proposed FMP.
111	Mining	According to the Plan (page 40), 47 per cent of the FMP area is included in State agreements or approved mining leases; in addition 34 per cent is covered by pending applications for mining leases and exploration licences. The Plan estimates approximately 7 per cent of FMP forests will suffer long term impacts from clearing and a total of approximately 28 per cent will be subject to 'various levels of fragmentation'. This is surely an unacceptable level of risk.	2c, 2d	Mining activities are largely beyond the scope of the plan under the existing legislative framework. Management activities in the 'Ecosystem health and vitality' chapter in the Proposed FMP set out how the Conservation Commission and DEC will work with other government agencies and industry regarding rehabilitation standards and ongoing management of minesite rehabilitation.
112	Mining	Alcoa's bauxite mining has already destroyed some 150 square kilometres of jarrah forest and causes detrimental fragmentation.	2d	Noted. Mining activities are largely beyond the scope of the plan under the existing legislative framework. Management activities in the 'Ecosystem health and vitality' chapter in the Proposed FMP set out how the Conservation Commission and DEC will work with other government agencies and industry regarding rehabilitation standards and ongoing management of minesite rehabilitation.
113	Multiple use	A sustainable native forest timber harvesting industry does not present a threat to biodiversity and other forest values (supported by findings from FORESTCHECK monitoring). The Draft FMP 2014-2023 proposes exclusive use of areas rather than integration, e.g. proposals relating to the Munda Biddi Trail.	2e	DEC supports multiple-use in many areas, and more limited use in some areas of State forests and timber reserves, and conservation reserves. In some areas, certain values are given more management emphasis than others.

Comment Number	Theme	Comment	Analysis category	Response
114	Old-growth forest	No logging of old-growth forest which should be protected to combat climate change and to support fauna and flora. The DEC definition of old-growth forest should not be allowed to limit the forest recommended for protection. The definition should be broadened to include lightly logged areas and those areas with dieback presence.	2d	Old-growth forest is protected from timber harvesting. Old-growth forest is defined in the Draft FMP as 'ecologically mature forest where the effects of unnatural disturbance are now negligible'. Only areas of forest larger than two hectares are included in DEC's database.
115	Old-growth forest	The definition of old-growth forest should not exclude that affected by <i>Phytophthora</i> dieback unless significantly affected.	2d	A definition of old -growth forest is provided in the Draft FMP. Dieback presence excludes areas from being classified as old-growth forest as it is classified as significantly disturbed forest.
116	Old-growth forest	A clear definition of old-growth trees needs to be implemented with a view to protection. A logging coupe needs to be surveyed and all old-growth trees embargoed from being logged. The definition of old-growth forest should include individual trees.	2d	Old-growth forest is protected from timber harvesting. Old- growth forest is defined in the Draft FMP as 'ecologically mature forest where the effects of unnatural disturbance are now negligible'. Only areas of forest larger than two hectares are included in DEC's database.
117	Old-growth forest	Modification of old-growth forest Option 2 with a process to be established to allow for the nomination of non old-growth forest previously mapped as old-growth forest. Nominations for old-growth forest should not be accepted late as they hold up harvest planning.	2e	Outside the formal reserve system, such areas are identified through pre-operations planning (the process that applies to timber harvesting will be applied to other disturbance operations - see management activity in the 'Biological diversity' chapter). Accordingly, a public nomination process for this is not thought necessary. However, timing for nominations is set out in relevant guidance documentation.
118	Old-growth forest	Suggests that areas previously incorrectly classified as old-growth should no longer be afforded that status. Mapped areas of old-growth forest found not to be old-growth forest should be relinquished from the informal and formal reserve systems. The Conservation Commission should accredit the DEC data used to determine the status of old-growth forest and reclassify all areas of 'old-growth forest under review' as 'non-old-growth forest'.	2a	The Proposed FMP does not support classifying these areas as informal reserves and does not support these proposed changes to formal reserves.
119	Old-growth forest	The Plan indicates that a number of 'old-growth forests' are under review and that the majority will probably cease to be classified as 'old-growth forests'. This would, presumably, make them accessible to logging. This should not be the case. Feel very strongly that logging in native forests (irrespective of their 'old-growth forest' status) should at the very least be reduced and ideally stopped entirely.	2e	The Proposed FMP does not support classifying these areas as informal reserves.

Comment Number	Theme	Comment	Analysis category	Response
120	Old-growth forest	Point 6, page 47. It is highly commendable that DEC will publish a map each year on its website depicting the extent and status of old-growth forest. However, it would be useful and applicable if they could extend this to include impacts of drought and frost on the forest. Landsat and other satellite derived imagery could be readily used to help derive such maps. This knowledge will help understand the biotic and abiotic drivers of these events. Recommendation to include an additional point: 6.3. Map and review impacts, severity and extent (area) of drought and frost events across the forest estate.	2e	The value of remote sensing is acknowledged and will be supported should resources become available.
121	Old-growth forest	Supports the identification of areas of old-growth forest by practicing professional foresters.	2e	Noted.
122	Old-growth forest	Concerned about the rejected 40 metre buffers that are needed to protect 24,000hectares of old-growth in state forest.	2e	The Draft FMP and Proposed FMP do not propose this.
123	Old-growth forest public nomination	Supports old-growth forest Option 1 re previously unmapped old-growth forest (page 36).	2e	The Proposed FMP supports the continuation of the nomination process, but it is intended that the administration will be transferred to DEC (as per Draft FMP Management Option 2).
124	Old-growth forest public nomination	Recommends adopting old-growth forest Management Option 2	2e	The Proposed FMP supports the continuation of the nomination process, but it is intended that the administration will be transferred to DEC (as per Draft FMP Management Option 2).
125	Old-growth forest public nomination	Supports old-growth forest Management Option 3 being 'discontinuance of the public nomination process' for future identification and assessment of old-growth forest areas as this is considered to be a more methodical, scientific, structured approach.	2e	The Proposed FMP supports the continuation of the nomination process, but it is intended that the administration will be transferred to DEC (as per Draft FMP Management Option 2).
126	Old-growth forest public nomination	Supports old-growth forest option 1 or 2 for unmapped old-growth forest	2e	The Proposed FMP supports the continuation of the nomination process, but it is intended that the administration will be transferred to DEC (as per Draft FMP Management Option 2).
127	Reserves	Over-reserved forest types which do not contain old-growth forests should be returned to the State forest land base for timber production, particularly in the southern forests where reservation is two or three times the Comprehensive, Adequate and Representative (CAR) requirements. Forest proposed and not accepted for formal reserve classification due to potential future mining projects, should be returned to State forest land base for timber production.	2d	These suggested changes to formal reserves are not supported.
128	Reserves	Congratulates consideration of the conservation reserve and State forest at landscape level as a great improvement. The Draft FMP is an improvement over the current FMP. In particular incorporation of the formal conservation reserves, mining tenements and plantations is a desirable shift to planning at the whole-of-forest/landscape level rather than planning for those parts of the forest available for harvesting only.	2a	Noted.

Comment Number	Theme	Comment	Analysis category	Response
129	Reserves	Concerned that the Draft FMP contains misleading information about reserves, where most of the reserves are of land not suitable for logging. Plan gives the impression that the reserves are of 'native forest ecosystems'. Important actions listed in the current FMP have still not been completed (e.g. creating all the proposed national parks).	2d, 2e	Comprehensive information about reserves is provided in the Draft FMP. As noted in the Draft FMP (page 32), earlier reserve proposals are being progressed and it may take some time to conclude the remaining administrative steps in the processes involved, which are mainly outside the control of DEC and the Conservation Commission.
130	Reserves	As an important strategy for biodiversity protection, the adequacy of the existing formal and informal reserve system and FHZ system in establishing sufficiently connected landscape scale network across State forest and protected areas requires detailed attention in the plan. Retain current levels of informal reserves and informal reserve types as a hedge against threats to biodiversity.	2d	This is a purpose of informal reserves, as noted in the Draft FMP (which proposed some modifications (e.g. travel routes) and additions, (e.g., Munda Biddi Trail). FHZ settings have been amended for this plan, resulting in a reweighting of the allocation of area to those forest ecosystems with lower levels of reservation, a slightly greater area of mature forest in FHZs, a lesser area of regrowth forest and a lesser total area in FHZs, a greater range of size of FHZs in recognition of the characteristics of the landscape in which they are located, and the inclusion of some large FHZs in areas of known fauna values.
131	Reserves	Concerned that the increased reservation of forests has occurred without an associated management plan to ensure the reservation objectives are being met. Unless Government recognises there is a cost in managing forest reserves and its obligations to ensure reservation is achieving the purpose for reservation, then it doesn't make sense to lock up additional forest in perpetuity only to witness the very values intrinsic to the forest degrade.	2d, 2c	The Draft FMP provides the management framework (which is retained in the Proposed FMP) for reserved areas in the absence of a specific area management plan. All old-growth forest is protected from harvesting in informal reserves. The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. However, resourcing is beyond the scope of the plan.
132	Reserves	DEC has failed to identify high conservation value forests that ought to be removed from production forest and placed in reserves.	2d	The Draft FMP includes a cascading set of measures for conserving biodiversity, including formal and informal reserves, complemented by other measures. All old-growth forest is protected from logging in informal reserves.
133	Reserves	Create more national parks.	2d	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, and other management plans, as per Draft FMP). Most forest ecosystems are well reserved in the CAR reserve system.
134	Reserves	Concerns raised over management options and strategies for Avon Valley National Park in relation to fuel loads, unexploded ordnance and lack of detail, particularly given there is no management plan for the Avon Valley National Park (or for the Julimar State Forest.) Wants to engage closely with DEC to develop a management plan for the Avon Valley National Park. Management options and strategies of particular interest are: fire management, tourism and recreational benefits and long term management of former Bindoon complex.	2c	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, and other management plans, as per the Draft FMP). All reserves in the FMP area without a current area management plan are covered by the Proposed FMP.

Comment Number	Theme	Comment	Analysis category	Response
135	Reserves	No additional reserves should be created, review established reserves and return to multiple use if not old-growth. Remove proposal to retain dead standing trees.	2e	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, and other management plans, as per the Draft FMP). The retention of some dead habitat trees as proposed is included in the Proposed FMP (as it was in the Draft FMP).
136	Reserves	No reason to increase the size of the reserve system (62 per cent in reserves already, formal or informal); exceeds CAR requirements. The RFA process resulted in the CAR reserve system which was designed to ensure a world class reserve system incorporating all identified forest ecosystems. The basis obligation for conservation of biological diversity has been achieved in WA through its CAR reserve system. This obligation was enhanced (at a cost to industry) with the 2001 old-growth Forest Policy decision, and subsequent management prescriptions including implementation of Faunal Habitat Zones. We believe that the forest is currently over-reserved and no further reservation is warranted.	2e	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, other management plans, as per the Draft FMP). The CAR reserve system is based on reserving a minimum percentage of each forest ecosystem.
137	Reserves	Does not believe that the proposed changes within the Draft FMP are warranted, particularly changes to silviculture prescriptions and increased reservation of forests. Concerns in relation to economic activity in the region.	2e	DEC will consult with key agencies as appropriate during revision of silviculture guidelines during 2013. The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs and other management plans, as per the Draft FMP).
138	Reserves	Proposes the establishment of a 5G reserve for no 3 coupe in the Mundlimup block, for research, education and recreation. Would assist in the retention of habitat, provide historical research data on tree growth and tree health, provide recreational opportunities e.g. Munda Biddi and background on history and heritage	2e	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, and other management plans, as per the Draft FMP).
139	Reserves	Proposes the reduction of the area of proposed (and not yet gazetted) reserves such as the area in Dalgarpur State Forest near Bridgetown. Compared to the Whicher scarp the Dalgarpur forest has lower conservation value and higher sawlog quality.	2e	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, and other management plans, as per the Draft FMP).
140	Reserves	Proposed changes to categories of land are supported for Clifton south, McLarty, Marrarup, Lane Poole and Icy Creek.	2a	Noted.

Comment Number	Theme	Comment	Analysis category	Response
141	Reserves	Three issues raised: i) proposal to elevate status Abba, Happy Valley and Argyle to national parks should be subject to government legislative and policy requirements and consultation with Department of Mines and Petroleum (DMP)/Minister for Mines and Petroleum; ii) Appendix 5 reserve proposals-FMP should also acknowledge DMP has expressed its position with respect to these, and that DEC will continue discussions to resolve key access issues; iii) proposed reserves cover tenure ranging from freehold land to Vacant Crown Land and the FMP should note development in these areas is not restricted by any reserve proposal.	1e	This has been considered in preparing the Proposed FMP. The Department of Mines and Petroleum will be consulted as appropriate.
142	Reserves	Supports additional reserves in the Whicher scarp.	2a	Noted.
143	Reserves	Scenario 2 in table 7 on page 106 of the Draft FMP proposes to "establish additional reserves within the Whicher Scarp ecosystem". Scenario 2 results in a lower level of sustained sawlog yield. The Whicher Scarp ecosystem is of high conservation value and generally produces lower quality sawlogs. An opportunity exists to increase reservation in this ecosystem and maintain the higher sawlog yield associated with Scenario 1.	2e	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, and other management plans, as per the Draft FMP).
144	Reserves	Opposes the reservation of areas of forest including the Whicher Scarp area unless an equal or greater area of currently reserved forest is made available for multiple-use including timber harvesting.	2e	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, and other management plans, as per the Draft FMP).
145	Reserves	Notes additions to the Whicher National Park and the decision-making process. Expressed concern that direct engagement with affected companies (tenements, project in EIA) has been very limited to date. Requests consultation with the Conservation Commission and opportunity to present a more detailed submission. Additions to Whicher National Park, should not proceed without due consideration as to how this will impact on potential resource access. Noted that infrastructure for some operations will have a 'relatively small footprint'.	2e	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, other management plans, as per the Draft FMP). Appropriate consultation will occur in the process of finalising reserve design.
146	Reserves	Request removing reserve 30656 to be added to the national park (Whicher). The area is a high grade lime sand resource (hold a prospecting licence and submitted a mineral licence).	2e	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, other management plans, as per the Draft FMP). Appropriate consultation will occur in the process of finalising reserve design.
147	Reserves	Reserve 14076 should also be included in the Whicher National Park.	2e	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, other management plans, as per the Draft FMP).

Comment Number	Theme	Comment	Analysis category	Response
148	Reserves	Adding area to Whicher National Park needs to be traded off with an area that can be released for multiple use.	2e	The Proposed FMP includes only the additions proposed for the Whicher National Park (and others from current and prior FMPs, other management plans, as per the Draft FMP).
149	Reserves	It is noted that the comments on the Draft FMP are to be considered jointly by the Conservation Commission and the EPA. This would appear to be unsatisfactory and not based on good governance of the resources of the State. All State Planning Policies recognise the need to consider not only the environmental and conservation values but those of basic raw materials and other natural resources. See State Planning Policy 1.0 State Planning Framework Policy and other policies such as SPP 2.0 Environment and Natural Resources Policy for example. These policies, although planning based, provide direction for all decisions of Government. I do not think that decisions such as the change of status of reserves or other land should be left to two organisations charged with conservation. Any changes must be only decided by a panel, including representatives from conservation, forestry, mining, planning and agriculture as a minimum in order to ensure that a sustainable future is available to all Western Australians and local regions.	2f	Noted. This issue is beyond the scope of the plan. The Conservation Commission has the role under the CALM Act of preparing management plans; the EPA has the role under the EP Act of assessing the environmental impact of development proposals.
150	Silviculture guidelines	The proposal to restrict harvesting and vehicle access in dieback affected areas where the live basal area is less than 18m ² /hectares should be removed completely from the FMP.	2d	The Proposed FMP includes the setting proposed in the Draft FMP to provide protection for recovery of these high impact sites. During finalisation of the silviculture guidelines in 2013, DEC will consult with industry as appropriate. DEC does not expect this will have a large impact on sustained yields.
151	Silviculture guidelines	Proposed changes to silviculture practice should be subject to thorough cost-benefit analysis and in-field trials before being considered for adoption. No proposed change to karri forest silviculture practice should be accepted as the guidelines have not been produced in conjunction with the release of the draft FMP for public comment. The industry must be given the opportunity to assess the impact of any proposed change on operations and production prior to implementation.	2d	During finalisation of the silviculture guidelines in 2013, DEC will consult with industry as appropriate.
152	Silviculture guidelines	Supports proposed modifications to silviculture guidelines on page 42.	2a	Noted, supports Draft FMP proposal (page 42).
153	Silviculture guidelines	Removal of habitat logs for firewood and charcoal is detrimental to dependent fauna; protect habitat trees and logs.	2a	Noted. The Proposed FMP includes the Draft FMP proposal for further protection of habitat logs (page 42).
154	Silviculture guidelines	Supports the retention of a greater proportion of old marri trees if practicable. Concerned that dead standing trees in karri forest be retained in areas to be salvage harvested.	2d	The Proposed FMP includes the retention of some dead habitat trees as proposed in the Draft FMP (page 42). Safety will be a consideration in determining which particular trees are retained for habitat and this will be addressed in guidance documents.

Comment Number	Theme	Comment	Analysis category	Response
155	Silviculture guidelines	Develop database of habitat elements retained (hollow bearing and future hollow bearing trees) to ensure retention of these elements from one logging cycle to the next.	2d	Noted. The feasibility of this can be assessed.
156	Silviculture guidelines	The expert panel which recently reviewed forest protection practices made the recommendation that habitat trees and logs should be retained to provide shelter for local fauna. The Plan (page 42) states that 'consideration will be given' to recording the location of these trees, logs etc. to ensure their continued protection during subsequent activities. It seems to us that this is not a matter for 'consideration'. It must be an established part of the process; otherwise, the habitat is unlikely to be preserved for long.	2d	Noted. The feasibility of this can be assessed.
157	Silviculture guidelines	Concerned about the decrease in the number of habitat trees retained in logged jarrah coupes from six per hectare in the draft plan to five per hectare.	2d	The Draft FMP and Proposed FMP do not propose a change from the existing figure of five per hectare.
158	Silviculture guidelines	The proposal to retain dead standing trees for an unknown biological value is offensive given one local contractor was recently killed by a falling dead tree. Dealing with dead and hazardous trees is a serious issue for logging contractors, and this proposal should be removed from the FMP. Questions the environmental and biological value of retaining dead standing trees. There is also a safety considerations to operations.	2d	The Proposed FMP includes retention of some dead habitat trees as proposed in the Draft FMP. Safety will be a consideration in determining which particular trees are retained for habitat and this will be addressed in guidance documents.
159	Silviculture guidelines	Draft FMP could have identified younger regrowth forests, additional strategies for comprehensively conserving existing and potential mature trees and groups of such trees at appropriate stages of development to support hydrological, ecological values, in addition to the mature tree requirements already specified under the existing silviculture guidelines as habitat trees.	2d	This is done at the forest stand level through implementation of silviculture guidelines (which are being revised consistent with the settings proposed in the Draft FMP). Additional marri habitat tree protection is included in the Proposed FMP as is the use of additional temporary exclusion areas to maintain stand structural complexity and landscape heterogeneity.
160	Silviculture guidelines	Proposal in jarrah silviculture guidelines to increase the number of marris retained for nesting black cockatoos, is not supported by removal of feral bees or domestic hives competing to occupy hollows.	2d	Control of feral bees is addressed in relevant recovery plans for threatened species.
161	Silviculture guidelines	Support the protection of senescing marri trees greater than 70cm in diameter, but not in surplus to existing requirements for habitat tree retention.	2d	The proposal in the Draft FMP is included in the Proposed FMP.

Comment Number	Theme	Comment	Analysis category	Response
162	Silviculture guidelines	No further destruction of marri trees-no poisoning. Insufficient protection of marri habitat trees. No disturbance buffer around habitat trees. Black cockatoo habitat is a priority and must take precedence over other considerations. No mention of the need to protect marri trees of all ages. Vital to preserve younger marri trees to maintain black cockatoo habitat in the long term. Marri cankers in urban and peri-urban areas as well as along major areas of disturbance need to be considered in management plans for black cockatoo species. Term 'where practicable' is not appropriate.	2d	The Draft FMP notes the importance of marri trees for black cockatoos and corresponding modifications to practices are outlined in the Draft FMP. Trees of various sizes, ages and species are retained in areas subject to timber harvesting. The use of 'where practicable' is appropriate and acknowledges other management considerations, such as safety and resourcing issues.
163	Silviculture guidelines	Remove the proposal to retain dead standing trees in the silviculture guidelines.	2d	The settings as proposed in the Draft FMP are included in the Proposed FMP.
164	Silviculture guidelines	It should be stipulated that southern forests will be exempt from the proposal to retain all marri trees 50-70cm in diameter, as this will impact on sawlog production.	2d	The settings as proposed in the Draft FMP (page 42) are included in the proposed FMP and apply only to jarrah and wandoo forests in certain Land Management Units-of which only Redmond Siltstone Plain is relevant (and most of this is in formal reserves).
165	Silviculture guidelines	Opposes removing trees with hollows.	2d	The retention of habitat elements as provided for by silviculture guidelines, will be revised in line with settings set out in the Draft FMP, which are retained in the Proposed FMP. These seek to provide adequate protection of trees with hollows.
166	Silviculture guidelines	Concerned that the additional measures put in place to protect marri habitat will not be enforced effectively and will not prevent the systematic degradation of marri habitat over time.	2d	Measures exist to protect habitat trees (e.g. tops disposal) and marking includes a component of recruitment habitat trees; compliance with these requirements is monitored routinely.
167	Silviculture guidelines	The maintenance and enhancement of foraging habitat for cockatoos will require preservation of all food-bearing tree species including jarrah and marri trees in the FMP area.	2e	The retention of habitat elements as provided for by silviculture guidelines has been revised in line with settings set out in the Draft FMP, which are retained in the Proposed FMP. These seek to provide adequate protection of trees with hollows.
168	Silviculture guidelines	Proposed changes in silviculture guidelines to retain mid-storey species should be removed. A goal of regenerating future sawlogs should be prioritised. Conflict between retention of jarrah mid-storey shrubs and small trees versus decrease in leaf area index for water production.	2d	The Proposed FMP includes settings as proposed in the Draft FMP. Partial retention of the mid-storey is important to maintaining a range of values. The goal to regenerate future sawlog trees is retained. Silviculture for water production is provided for in the Proposed FMP and DEC will revise requirements from those in the Draft FMP to put more emphasis on provision of multiple values.
169	Travel routes	Requests that the planning process give greater consideration to accessing larger diameter (>50mm) karri sawlog resource in informal reserves such as travel routes. Thinning from above should be explicitly proposed to ensure short-term supply of larger diameter logs and long-term growth of remaining stems within the informal reserves.	2e	Timber harvesting in informal reserves is not supported, except some thinning in travel route zones as provided for in the guidelines for informal reserves.
170	Travel routes	Redistribute and streamline travel routes as proposed in the Draft FMP.	2a	Noted.

Comment Number	Theme	Comment	Analysis category	Response
171	Travel routes	Current travel routes to be maintained.	2e	The changes proposed to travel routes are included in the Proposed FMP.
172	Travel routes	Supports the inclusion of redundant travel routes (page 36) in the Warren Region.	2e	The changes proposed to travel routes are included in the Proposed FMP.
Ecosystem health and vitality				
173	Disease	The response to forest diseases, including dieback, is totally inadequate.	2d	There is a comprehensive range of measures to manage diseases, including dieback, as outlined in the Draft FMP 'Ecosystem health and vitality' chapter, and retained in the Proposed FMP.
174	Disease	Concerned the Draft FMP has proposed the retention of additional dieback resistant trees and further to restrict vehicle access to areas where the live basal area (BA) is less than 18 sqm/ha. This will have far reaching implications for harvesting operations. Many dieback resistant stands provide a large proportion of the volume to the industry and this stipulation must be removed from the FMP.	2d	The Proposed FMP includes the protection for recovery of high impact sites through implementation of the silviculture guidelines proposed in the Draft FMP. While the Department does not expect this will have a large impact on sustained yields, it will consult with industry during finalisation of the silviculture guidelines in 2013.
175	Disease	Dieback: review the basis of the basal areas (BAs) (18 sqm/ha and 15 sqm/ha) stated in the management strategy supporting Principle 5 of the proposed jarrah silviculture guideline. Would preclude effective thinning for improved health and increase in water yield.	2d	The Proposed FMP includes the settings proposed in the Draft FMP to provide protection for recovery of dieback affected sites.
176	Disease	Little education and resources, lack of management strategies outlined to control spread of dieback (e.g. lock away areas of State forest and national parks from public access and restrict access by 'authorities').	2d	There is a comprehensive range of measures to manage diseases, including dieback, as outlined in the Draft FMP 'Ecosystem health and vitality' chapter, and retained in the Proposed FMP. The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. However, resourcing is beyond the scope of the plan.
177	Disease	Areas of high disease impact should not be logged.	2d	The Proposed FMP includes the settings proposed in the Draft FMP to provide protection for recovery of dieback affected sites.
178	Disease	Area of cutting should be reduced to reduce spread of disease.	2d	There is a range of disturbance activities, uses and other factors that contribute to the spread of dieback. A comprehensive range of measures to minimise the spread of dieback is included in the Draft FMP and retained in the Proposed FMP.
179	Disease	It is likely that new forest diseases such as Myrtle Rust will spread from the eastern states. Logging is one major stress that can readily be removed to protect and restore healthy, resilient forest ecosystems.	2d	There is a comprehensive range of measures to manage existing and potential diseases, as outlined in the 'Ecosystem health and vitality' chapter.

Comment Number	Theme	Comment	Analysis category	Response
180	Disease	It is important here (page 144) and elsewhere in the plan when discussing <i>Phytophthora</i> not to place all the emphasis on <i>P. cinnamomi</i> . Increasingly other <i>Phytophthora</i> species are being found to be important pathogens. For example, <i>P. multivora</i> has a wider distribution than <i>P. cinnamomi</i> and its host range is increasing (currently more than 20 native plant species are susceptible, and this will increase). <i>Phytophthora multivora</i> is also pathogenic on calcareous soils (unlike <i>P. cinnamomi</i>) and therefore consideration must be given to this pathogen being spread in limestone sold as road base material.	2d	To be considered during review of relevant guideline(s). There is a comprehensive range of measures to minimise the spread of dieback, as outlined in the 'Ecosystem health and vitality' chapter. The Guidelines for the Management and Rehabilitation of Basic Raw Material Pits are referenced in the 'Socio-economic benefits' chapter.
181	Disease	There is a lack of research in relation to control of diseases and species decline, impacts on climate change, etc. This knowledge should underpin any proposals for logging of the publicly owned forest system.	2d	Extensive research and knowledge transfer has been conducted and the Draft FMP includes management activities (retained in the Proposed FMP) that seek to ensure that this continues.
182	Disease	Dieback: Principle 5 of the proposed jarrah silviculture guideline: management strategy, does vehicle access imply road closure?	2d	To be considered during review of relevant guideline(s). These guidelines are identified in management activities in the 'Soil and water' chapter in the Draft FMP and retained in the Proposed FMP.
183	Disease	The health and resilience of forests have been compromised by spread of a number of diseases.	2d	The threats to the health and vitality of natural ecosystems are acknowledged. There is a comprehensive range of measures to manage existing and potential diseases, as outlined in the 'Ecosystem health and vitality' chapter.
184	Ecosystem health and vitality	The more modified and repeatedly disturbed the forest, the less variable its environmental conditions for sustained ecological values such as critical habitat heterogeneity become.	2d	Habitat values and biodiversity are provided for at three levels: formal reserves, forest conservation areas, informal reserves and FHZs; and retention strategies at the local level. This includes measures in the Draft FMP, retained in the Proposed FMP, that seek to maintain stand structural complexity and landscape heterogeneity. Silvicultural practices and prescribed burning are developed based on consideration of natural disturbance regimes.
185	Ecosystem health and vitality	Suggests a proposed monitoring program to record drought indicators. Such a program should include an annual aerial measurement of leaf area index, permanent bores for recording the depth to water tables, an expansion of the FORESTCHECK program.	2d	A KPI in the Draft FMP, retained in the Proposed FMP, includes the monitoring of groundwater. The plan seeks to maintain and extend FORESTCHECK (e.g., Draft FMP page 50), retained in the Proposed FMP. Leaf area index has been monitored in some areas by other groups and the Department is investigating the feasibility of its application in its monitoring program.

Comment Number	Theme	Comment	Analysis category	Response
186	Ecosystem health and vitality	As recognised in the plan, the south-west of the State is predicted to get warmer and drier in the coming decades. In 2010/11 the State experienced the lowest winter rainfall on record (2010), followed by 122 continuous days of no rain. By February 2011 there was major collapse of vegetation in the northern jarrah forest.. Deaths continued into May/June. Marri and jarrah were the primary canopy trees observed to be impacted upon. Banksia was observed to be extremely drought sensitive and had obviously been retracting from the collapsed sites over the last decade, indicating that soil moisture on these sites had been declining in the years prior to the 2010/11 event. <i>Banksia grandis</i> could well be used as an early indicator species for areas of forest that are drought prone. Modern rainfall impacts 2001-12 on the south-west canopy critically disabled more than a decade of the south-west's field sequence of canopy growth flushes on mature stands. Thus while it was viable and reasonable for south-west forestry to assume reliable south-west annual rainfall trends for the forest's next-decade growth product, south-west forest managers should have been abandoning this failing assumption by 2006-10 because their forest's canopy was changing dramatically versus the late 1990s and versus earlier decades. This FMP evaded canopy decline trend which was associated with species-significant marsupial decline and serious stand dieback trends within the FMP footprint and during the FMP decade 2004-13.	2d	The Draft FMP has been developed in line with the principles of ESFM as detailed in the CALM Act, including biodiversity conservation and ecosystem health, which are fundamental considerations. As acknowledged in the Draft FMP (page 51), impacts from various factors may be cumulative and/or interact in ways that are not always well understood. Also, as stated in the Draft FMP (page 84): <i>Given current knowledge and uncertainties of the likely magnitude and result of changes to climate from increases in atmospheric levels of GHGs, it is considered the management activities proposed throughout the Draft FMP encompass an appropriate range of broad precautionary actions. Adaptive management to enhance resilience will likely be of increasing importance and there needs to be flexibility to respond as new information becomes available.</i> It has been known for some time that <i>B grandis</i> is a potential drought indicator, and the best available/most recent rainfall data and Indian Ocean Climate Initiative /CSIRO climate projections have been used in developing the plan.
187	Ecosystem health and vitality	The predictions of a continuing drying of the State's south-west climate are sobering, and should be a catalyst for the active management of the State forest to improve ecosystem health and resilience.	2d	The Draft and Proposed FMPs refer to and seek to addresses the potential impacts of climate change in numerous places throughout, including through provision for 'silviculture for ecosystem health' and 'silviculture for the water production'.
188	Ecosystem health and vitality	Irresponsible to continue large scale commercial logging when the south-west forest is under enormous stress from: (i) a marked decline in rainfall in the south-west, with this decline likely to continue; (ii) the emergence of serious biological diseases affecting tree species; (iii) continuing predation and expansion of feral species; and (iv) rapid ecosystem change through too frequent fires. This is in the context of a less resilient forest system due to past unsustainable logging practices, and less resources being provided by government to properly manage the forest.	2e	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM. A comprehensive range of measures to manage invasive species (pests, weeds and diseases) and address climate change is included in the Draft FMP and retained in the proposed FMP. The Department's approach to prescribed burning to mitigate the risks posed by bushfires is outlined in the Draft FMP (pages 53-56) and retained in the proposed FMP. The best available/most recent Indian Ocean Climate Initiative (IOCI)/CSIRO climate data and projections have been used. The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. However, resourcing is beyond the scope of the plan.

Comment Number	Theme	Comment	Analysis category	Response
189	Ecosystem health and vitality	Frost is likely to impact on jarrah and marri health in particular, but also on other ecosystem services, pollination and nectar services from marri and food for iconic species like black cockatoos which rely on the marri fruit for sustenance. The IPCC and other groups have predicted it will be dryer and hotter with an increased frequency of high pressure systems over the south-west. High pressures bring clear skies, less rain and the warmer weather. During the day, static high pressures produce heat over the southwest because they bring the warm wind in off the desert (if positioned right) during the day and allow maximum short wave radiation to heat the surface (i.e. clear skies). At night, they also allow for a maximum release of long wave radiation (no clouds to stop heat escaping from the Earth) and they also bring the cool air off the desert. Therefore, this combination actually favours frost. Severe frost events are very likely to be seen more frequently in the future and these need to be accounted for in the FMP.	1e	The Proposed FMP text has been amended to acknowledge frost as a potential event affecting areas covered by the plan.
190	Ecosystem health and vitality	A principal failing of the Draft FMP is that it does not acknowledge all the main drivers behind deterioration of our forest systems and the environment generally. This is necessary to address if all the difficulties are to be tackled effectively.	2e	The factors impacting ecosystem health and vitality of natural areas within the area covered by the plan are identified in the Draft and Proposed FMP, along with a summary of the potential consequences of climate change. A comprehensive range of measures to manage invasive species (pests, weeds and diseases) and address climate change is also included. <i>[Also see response immediately below]</i>
191	Ecosystem health and vitality	Draft FMP fails to address the impacts of climate change and disease on forest health and productivity.	2d	The Draft FMP has been developed in line with the principles of ESFM as detailed in the CALM Act, including biodiversity conservation and ecosystem health, which are fundamental considerations. As acknowledged in the Draft FMP (page 51), impacts from various factors may be cumulative and/or interact in ways that are not always well understood. Also, as stated in the Draft FMP (p84): <i>Given current knowledge and uncertainties of the likely magnitude and result of changes to climate from increases in atmospheric levels of GHGs, it is considered the management activities proposed throughout the Draft plan encompass an appropriate range of broad precautionary actions. Adaptive management to enhance resilience will likely be of increasing importance and there needs to be flexibility to respond as new information becomes available.</i>

Comment Number	Theme	Comment	Analysis category	Response
192	Ecosystem health and vitality	Better management of pressures impacting on forest estate, including destructive recreational use (4WD), invasive pest and fire.	2d	The Draft FMP includes a range of measures to address these issues. There is a comprehensive range of measures to manage invasive species outlined in the plan. The Department's approach to prescribed burning to mitigate the risks posed by bushfires is also outlined. The 'Socio-economic benefits' chapter includes a management activity to address the issue of recreational vehicle use, which is also managed through measures and processes detailed in subsidiary and other Departmental documents.
193	Ecosystem health and vitality	Concerned about a dramatic decrease of forest cover and erosion observed within the Collie-Palmer area, Northcliffe area (Nairn, Dombakup and Crowea), Arcadia and Yabberup, Helms and Chester and Warrup, which is in agreement with remote sensing and supplemented aerial photography monitoring.	2d	The plan was developed in the context of contemporary pressures and legacy issues. Measures to address the maintenance of native vegetation and forest cover are included in the 'Biological diversity' and 'Productive Capacity' chapters of the Draft FMP and retained in the Proposed FMP.
194	Ecosystem health and vitality	the Conservation Commission unable to provide any credible assurance that an ecologically sustainable logging industry is feasible.	2e	The Conservation Commission has a role to audit the implementation of management plans, in this case as reported in the mid- and end-of-term audits of the current FMP, which have informed development of this plan. Habitat values and biodiversity are provided for at three levels - formal reserves; forest conservation areas, informal reserves and FHZs; and retention strategies at the local level. This includes measures in the Draft FMP, as retained in the Proposed FMP, that seek to maintain stand structural complexity and landscape heterogeneity. Silvicultural practices and prescribed burning are developed based on consideration of natural disturbance regimes. Research and long-term monitoring of the effects of timber harvesting on biodiversity, including that conducted through the Department's major monitoring program, FORESTCHECK, shows that its impacts on the biodiversity groups monitored, are relatively transient (Abbott and Williams, 2011). Also, monitoring of regeneration of forest following harvesting by the FPC and by the Department (including through FORESTCHECK) has found that regeneration is being effectively achieved across both the karri and jarrah forests. Nevertheless, additional provisions to enhance regeneration outcomes will be included in the revised silviculture guidelines, as outlined in the Draft FMP (see pages 120 and 122).
195	Ecosystem health and vitality	There is little control over off road vehicle recreation use resulting in soil damage, vegetation loss, spread of dieback and weeds, and stream turbidity.	2d	The threats are acknowledged and various management measures are used, including access restrictions (including Disease Risk Areas), DEC patrols; and gazetted Off Road Vehicle areas (the Draft FMP also provides for consideration of additional ORV areas - see proposed management activity 92.3, which has been retained in the Proposed FMP.

Comment Number	Theme	Comment	Analysis category	Response
196	Ecosystem health and vitality	Dieback, weed and pest management are considered to be essential to ensure the health of the forest as well as mitigating the spread to surrounding areas.	2d	There is a comprehensive range of measures to manage invasive species (pests, weeds and diseases), as outlined in the Draft and Proposed FMPs.
197	Ecosystem health and vitality	Foolhardy to continue at the present (or higher) level of logging, mining and other potentially damaging activities in native forests. Forests are already showing signs of stress. Difficult to achieve a return to the former natural state for an environment affected by mining activities. This will only become worse with the impact of climate change.	2c	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM. Habitat values and biodiversity are provided for at three levels - formal reserves; forest conservation areas, informal reserves and FHZs; and retention strategies at the local level. This includes measures in the Draft FMP that seek to maintain stand structural complexity and landscape heterogeneity. Silvicultural practices and prescribed burning are developed based on consideration of natural disturbance regimes. Research and long-term monitoring of the effects of timber harvesting on biodiversity, including that conducted through the Department's major monitoring program, FORESTCHECK, shows that its impacts on the biodiversity groups monitored, are relatively transient (Abbott and Williams, 2011). Also, monitoring of regeneration of forest following harvesting by the FPC and by the Department (including through FORESTCHECK) has found that regeneration is being effectively achieved across both the karri and jarrah forests. Nevertheless, additional provisions to enhance regeneration outcomes will be included in the revised silviculture guidelines, as outlined in the Draft FMP (see pages 120 and 122). Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans, however, the Draft FMP includes measures that seek to reinstate a range of values from minesite rehabilitation. All these measures are included in management activities retained in the Proposed FMP, including that DEC will seek to maintain and extend FORESTCHECK to monitor biodiversity trends.
198	Ecosystem health and vitality	The FMP should consider the synergistic interactions between major disturbance events (such as drought, frost and mining) together with logging and fire and how these will impact on biodiversity, and ecosystem function and health in the future.	2d	As acknowledged in the Draft FMP (page 51), impacts from various factors may be cumulative and/or interact in ways that are not always understood. As stated in the Draft FMP (p84): "... it is considered the management activities proposed throughout the Draft plan encompass an appropriate range of broad precautionary actions. Adaptive management to enhance resilience will likely be of increasing importance and there needs to be flexibility to respond as new information becomes available". The Draft FMP includes a range of measures (retained in the proposed FMP) to address these issues.

Comment Number	Theme	Comment	Analysis category	Response
199	Ecosystem health and vitality	Encourage practices that restore the forest estate, rehabilitating and replanting degraded areas.	2d	The Draft FMP includes various measures, which are retained in the proposed FMP, related to rehabilitation and regeneration.
200	Ecosystem health and vitality	Include mention of <i>Quambalaria coyrecup</i> (marri canker) and <i>Quambalaria piterika</i> (marri shoot, bud and flower blight) in <i>Corymbia calophylla</i> as well as the incidence of frost damage in the northern jarrah forest.	2d	<i>Quambalaria</i> was mentioned in the main body of the Draft FMP (page 62), and is mentioned in the Proposed FMP. Reference to frost has been added to the Proposed FMP in the background section of the 'Ecosystem health and vitality' chapter.
201	Ecosystem health and vitality	Setting aside areas of State forest as conservation reserves is important to preserve ecosystem health. However, many of the areas that were supposed to be made conservation reserves under the current FMP have not had their status changed. This must be remedied as a matter of urgency. While the proposal for additional conservation reserves under the Draft FMP is welcome, it is essential that the areas already set aside for conservation have their status formally changed.	2d	As stated in the Draft FMP (page 32), and retained in the Proposed FMP, prior/current FMP reserve proposals are being progressed and it may take some time to conclude the remaining administrative steps in the processes involved, which are largely outside the control of DEC and the Conservation Commission.
202	Fire Management	Fire management strategies could be prepared for each town site area in order to deal with different and unique circumstances and varying levels of bush fire volunteer service provision.	2d	This is factored into DEC's prescribed burn planning, where DEC has responsibility for the land in question.
203	Fire Management	The draft plan does not take into account the likelihood of more frequent and hotter summer wildfires - which is a very likely outcome of a drying and warming climate.	2d	The likelihood of more frequent and intense bushfires associated with climate change is acknowledged in the Draft FMP (page 85).
204	Fire Management	The FMP should acknowledge that there is no inevitable consequence of climate change in terms of bushfire severity- severe bushfires are a consequence of mismanagement not climate.	2e	The likelihood of more frequent and intense bushfires associated with climate change is noted in the Draft FMP (page 85). The Department's approach to prescribed burning to mitigate the risks posed by bushfires is outlined in the Draft FMP (pages 53-56), and retained in the Proposed FMP.
205	Fire Management	Should develop a fire application for mobile phones.	2c	This is a level of detail that is beyond the scope of the plan but may be considered separately by the Department and other fire management agencies.
206	Fire Management	In the case of catastrophic fires the plan should commit to reduce the area for logging by a commensurate size.	2d	The calculation of sustained yield over the timeframe of the FMP takes into account various factors, including bushfires. Areas harvested are planned to meet wood supply contracts, within the sustained yields set by the plan.
207	Fire Management	Increasing fuel loads increase the likelihood of damaging fires.	2d	This is acknowledged in the Draft FMP (page 53), and retained in the Proposed FMP. Fuel loads are factored into DEC's prescribed burn planning.
208	Fire Management	Requests an assessment be made of the impact any reduction in forest harvesting volumes and associated loss of human and plant capacity would have on the ability to manage and respond to wildfire.	2c	The Department has a number of contract resources available to assist with bushfire control across the plan area. An assessment of this sort is beyond the scope of the plan.

Comment Number	Theme	Comment	Analysis category	Response
209	Fire Management	The FMP should call for an increase in the amount and frequency of prescribed burning in the interest of optimising biodiversity with community protection a priority. The FMP should make it clear that dead standing trees are not to be retained within 100 metres of road boundaries. Planning: the FMP should require a change of focus in DEC's fire planning, moving away from constraints to fire behaviour prescription and burn management. It is critical that there are thorough training programs to ensure fire competency is maintained. Forest hydrology: the FMP should propose that forests on catchments be subjected to an integrated program of thinning and frequent mild-intensity fuel reduction burning. Recommends: 1) broad acre mild-intensity prescribed burning; 2) fire management must be elevated to top priority for DEC's field operations; 3) DEC must prepare, publish and begin to implement a Bushfire Management Recovery Program aimed at regeneration of the system and the staff who manage it; and 4) the fuel reduction program in south-west forests that was successful in the period 1970-1995 must be reinstated. This will involve more burning and burning at more frequent intervals than is presently the case.	2d	The Draft FMP notes protection of legacy habitat elements will be addressed in the review of fire management guidelines (management activity 15, page 49), and the Department's approach to prescribed burning to mitigate the risks posed by bushfires is outlined in the Draft FMP (pages 53-56). These measures are retained in the Proposed FMP. Local issues are considered in prescribed fire plans prepared for each planned burn. The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. However, resourcing is beyond the scope of the plan.
210	Fire Management	DEC's prescribed burning program should be modified to burn smaller areas and limit burns to autumn.	2d	The Department's approach to prescribed burning is outlined in the Draft FMP (pages 53-56) and retained in the Proposed FMP, and includes variation in intensity, seasonality, frequency and spatial heterogeneity.
211	Fire Management	Acknowledges the prescribed burning program as a 'legitimate' tool in managing bushfire risk. Recommends a range of initiatives to be incorporated in the development of the plan to manage the impact of smoke taint in the wine industry.	2d	Local issues are considered in prescribed fire plans prepared for each planned burn.
212	Fire Management	Prescribed burning does nothing for home protection unless it is close to the settlements.	2e	The Department's approach to prescribed burning is outlined in the Draft FMP (pages 53-56), and retained in the Proposed FMP. Management of fuel loads through prescribed burning has been shown to be an effective means of reducing the risks posed by bushfire.
213	Fire Management	Each year DEC should produce publicly available maps showing fuel age (i.e. years since last burnt) for areas under its control.	2d	The Department prepares fuel age distributions for each Landscape Conservation Unit within the plan area, as part of reporting on the 2004-2013 FMP key performance indicator 16. This information is made available for Conservation Commission audits.

Comment Number	Theme	Comment	Analysis category	Response
214	Fire Management	Fire management is skewed towards fuel reduction at the expense of environmental, social and economic values. The FMP should contain procedures that ensure prescribed burning is properly regulated to ensure unnecessary harm is minimised to the environment and property. Should stipulate that forest health is taken into account during planning for prescribed burning.	2d	The Department's approach to prescribed burning is outlined in the Draft FMP (pages 53-56), and retained in the Proposed FMP, and is based on contemporary research and considers assets, environmental and other values.
215	Fire Management	The native forest timber industry is not ecologically sustainable. The Draft FMP ignores high vulnerability of the possum to fire.	2d	As noted in the Draft FMP (e.g. page 39), native fauna are considered in planning for prescribed burning. Prescribed burning aims to limit the impacts on native fauna that may otherwise occur as a result of large-scale, high intensity bushfires.
216	Fire Management	Concern about the extent and frequency prescribed burning -and suggests that the FMP should consider alternatives.	2d	The Department's approach to prescribed burning is outlined in the Draft FMP (pages 53-56) and is based on contemporary research and considers assets, environmental and other values. Management of fuel loads through prescribed burning has been shown to be an effective means of reducing the risks posed by bushfires, and is used in combination with other measures, including maintenance of firebreaks and other access. This approach is retained in the Proposed FMP.
217	Fire Management	Fire management should be entrusted to independent ecologists or wildfire risk assessors.	2d	Ecologists contribute to the fire management program. The Office of Bushfire Risk Management has a role to independently assess risks associated with fire management.
218	Fire Management	Concerned about burning, main goal seems to be timber production.	2e	The Department's approach to prescribed burning is outlined in the Draft FMP (pages 53-56) and is based on contemporary research and considers assets, environmental and other values. This approach is retained in the Proposed FMP. Some prescribed burning is undertaken in conjunction with timber harvesting.
219	Habitat protection	No deforestation.	2e	Noted.

Comment Number	Theme	Comment	Analysis category	Response
220	Habitat protection	<p>The logging industry is not ecologically sustainable. Protection of black cockatoos, numbats, mainland quokkas, ringtail possums, quolls, phascogales, and dozens of other threatened species rely on the habitat provided by old trees which are never replaced after an area is logged because of the short time between logging operations. This goes to the very heart of the definition of sustainability: our forests do not regrow to what they were before they were logged, the ecosystems are degraded and the quality and quantity of timber is not regrown. Logging will destroy ecosystems. Ecosystems will not recover from logging. The combined effects of heat stress from longer and hotter summers; insect and borer attack; and fungal forest diseases means that our forests are on the brink of catastrophic collapse, even should logging not continue. There is inadequate protection for endangered species. Effects of climate change may compound the impacts of logging. The '40 years showing no long term affect' has no meaning. Past logging practices and post European settlement has left a legacy of degraded forests. "The FPC (sic) has identified multiple examples where logging has breached the FPC's guidelines for protecting threatened fauna, recording, for example, machinery incursions into FHZs."</p>	2e	<p>Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM. Habitat values and biodiversity are provided for a three levels - formal reserves; forest conservation areas, informal reserves and FHZs; and retention strategies at the local level. This includes measures in the Draft FMP that seek to maintain stand structural complexity and landscape heterogeneity. Silvicultural practices and prescribed burning are developed based on consideration of natural disturbance regimes. Additional measures will be included in revised silviculture guidelines (page 42) for enhancing biodiversity outcomes (for example, protecting marris as a source of food and habitat for cockatoos). Research and long-term monitoring of the effects of timber harvesting on biodiversity, including that conducted through the Department's major monitoring program, FORESTCHECK, shows that its impacts on the biodiversity groups monitored, are relatively transient (Abbott and Williams, 2011). Also, monitoring of regeneration of forest following harvesting by the FPC and by the Department (including through FORESTCHECK) has found that regeneration is being effectively achieved across both the karri and jarrah forests. Nevertheless, additional provisions to enhance regeneration outcomes will be included in the revised silviculture guidelines, as outlined in the Draft FMP (see pages 120 and 122). All these measures are included in management activities retained in the Proposed FMP, including that the Department will seek to maintain and extend FORESTCHECK to monitor biodiversity trends.</p>
221	Habitat protection	Area of cutting should be reduced to retain biodiversity	2d	<p>The area harvested is limited by the sustained yield, which is calculated taking into account the range of settings that provide for ESFM, including conservation of biodiversity. Research and long-term monitoring of the effects of timber harvesting on biodiversity, including that conducted through the Department's major monitoring program, FORESTCHECK shows that its impacts are relatively transient (Abbott and Williams, 2011).</p>

Comment Number	Theme	Comment	Analysis category	Response
222	Habitat protection	Logging and burn offs are a major threat to a range of fauna and flora.	2d	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM. Habitat values and biodiversity are provided for a three levels - formal reserves; forest conservation areas, informal reserves and FHZs; and retention strategies at the local level. This includes measures in the Draft FMP that seek to maintain stand structural complexity and landscape heterogeneity. Silvicultural practices and prescribed burning are developed based on consideration of natural disturbance regimes. Additional measures will be included in revised silviculture guidelines (page 42) for enhancing biodiversity outcomes (for example, protecting marris as a source of food and habitat for cockatoos). Research and long-term monitoring of the effects of timber harvesting on biodiversity, including that conducted through the Department's major monitoring program, FORESTCHECK, shows that its impacts are relatively transient (Abbott and Williams, 2011). Also, monitoring of regeneration of forest following harvesting by the FPC and by the Department (including through FORESTCHECK) has found that regeneration is being effectively achieved across both the karri and jarrah forests. Nevertheless, additional provisions to enhance regeneration outcomes will be included in the revised silviculture guidelines, as outlined in the Draft FMP (see pages 120 and 122).
223	Harvesting native forest	The EPA in its last formal advice to government indicated that any new forest management plan would need to have logging scaled down significantly.	2d	The area harvested is limited by the sustained yield, which is calculated taking into account the range of settings that provide for ESFM, including conservation of biodiversity. The process for calculating sustained yield has been subject to an independent review.
224	Mining	Impact that mining has also on the environment? Strip mining - rehabilitation does not restore ecosystems.	2d	Mining and the rehabilitation that follows mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans. However, the Draft FMP acknowledges the challenges associated with efforts to restore the full range of values and potential uses following mining (page 64), and includes a range of measures related to minesite rehabilitation (pages 65-66). These measures are retained in the Proposed FMP.
225	Mining	Supports the thinning (page 101) of jarrah stands following mining rehabilitation.	2a	Noted.

Comment Number	Theme	Comment	Analysis category	Response
226	Mining	The timber industry required to abide by strict guidelines whilst some areas of the better classes of jarrah forest are subject to bauxite mining with loss of biodiversity. Requirements for rehabilitation are idealistic and unlikely to result in the return of a normally functioning forest.	2d	Mining and the rehabilitation that follows mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans. However, the Draft FMP acknowledges the challenges associated with efforts to restore the full range of values and potential uses following mining (page 64), and includes a range of measures related to minesite rehabilitation (pages 65-66). This approach is retained in the Proposed FMP.
227	Mining	Stand densities need to be revisited in context of a drying climate- it is likely that stands with 2000 plus stems per ha will collapse once soil water is utilised. Consideration needs to be given to modifying the prescriptions of tree density in future restored mine sites and consideration to reducing stand densities on existing restored pits to ensure sites do not collapse in the future. As shown in Figure 1, drought deaths are already being observed in restored bauxite mines and this will most likely to increase in impact and severity in a future drying and warming climate. Since some 47 per cent of the total forest area in the plan area is covered by State Agreements or approved mining leases it is critical that the FMP considers how to manage restored mines into the future with predicted climate change (warming and drying climate). The continuation of current stand density prescriptions is not feasible into the future and these should be modified.	2d	The Draft FMP proposes thinning of rehabilitated minesites and the initial stand densities are periodically reviewed as part of established agency-industry processes for minesite rehabilitation. This approach is retained in the Proposed FMP.
228	Pests	Supports the control of introduced species and Western Shield.	2a	Noted.
229	Pests	Support holistic approach, but appropriate funding is needed to manage and control forest weeds, pest and disease. The plan lacks strategies linked to given timeframes.	2a, 2d	Noted. The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. However, resourcing is beyond the scope of the plan. Specific management programs include timeframes as appropriate.
230	Pests	Decrease in log extraction has led to an increase in feral presence of foxes, pigs etc.	2e	There is a comprehensive range of measures to manage invasive species (including pests) as outlined in the Draft and Proposed FMPs.
231	Pests	The burning program enables feral animals to breed but destroys native fauna and flora.	2e	The Department's approach to prescribed burning is outlined in the Draft FMP (pages 53-56) and is based on contemporary research and considers assets, environmental and other values. As noted in the Draft FMP, native fauna (e.g., page 39) and flora are considered in planning for prescribed burning. Prescribed burning aims to limit the impacts on biodiversity values that may otherwise occur as a result of inappropriate fire regimes. This approach is retained in the Proposed FMP.

Comment Number	Theme	Comment	Analysis category	Response
232	Tree deaths	Large sections of the forest are dying. There is very little pristine forest left.	2d	The potential consequences of climate change are summarised in the Draft FMP (pages 84-86) and an appropriate, broad range of precautionary measures to address climate change is included (in various sections). These measures are retained in the Proposed FMP. Old-growth forest is protected from timber harvesting.
Soil and water				
233	Catchment management	Catchment management plans should consider benefits of thinning for a range of values and the risk of not taking action. The next FMP should include a framework for water catchment thinning that produces increased stream flow, healthier residual forest catchment areas and a viable recovery program.	1d	The Proposed FMP provides for catchment management plans (the scope of these was included in the Draft FMP as Appendix 15, which is being revised to include assessment of risks and benefits of taking action or not. The requirements for issues to be addressed in catchment management plans will be periodically revised during the period of the plan).
234	Catchment management	The objective needs to be much more embracing of what a forest ecosystem is about. Any catchment plan should put an emphasis on ecosystem health and function, not just water production. Therefore, the objective needs to be modified to reflect ecosystem health and function. Finally, the objective only identifies 'risks' – 'benefits' should also be considered. A catchment plan needs to be holistic in its approach.	1d	The Proposed FMP provides for catchment management plans (the scope of these was included in the Draft FMP as Appendix 15, which is being revised to include assessment of risks and benefits of taking action or not. The requirements for issues to be addressed in catchment management plans will be periodically revised during the period of the plan).
235	Catchment management	Recommends that the proponent for a catchment management plan should be DEC; the plan must also identify the benefits as well as the risks; and the level of planning is onerous and will provide an impediment to action.	1d	The Proposed FMP provides for catchment management plans (the scope of these was included in the Draft FMP as Appendix 15, which is being revised to include assessment of risks and benefits of taking action or not. The requirements for issues to be addressed in catchment management plans will be periodically revised during the period of the plan). The proponent for a plan would need to reflect the economic driver for the plan which is likely to be for water supply or wood products.
236	Catchment management	Catchment management plans are an additional layer of approval. Thinning requires a commercial imperative and establishing a market will need security of access to invest, jeopardising these operations to increase water production (page 23). The FMP 2014-2023 provides the approval for thinning operations. Catchment management plans are the vehicle for fine scale project design and integrating other values.	2d	The Proposed FMP provides for catchment management plans (the scope of these was included in the Draft FMP as Appendix 15, which is being revised to include assessment of risks and benefits of taking action or not. The requirements for issues to be addressed in catchment management plans will be periodically revised during the period of the plan). Catchment management plans are intended to sit between the approved forest management plan and the indicative three year harvest plan and provide the strategic integration of a range of values at this level.
237	Catchment management	Stream flow and forest health in catchment areas draw limited direction from the plan. The Wungong trial is not moving at a pace that reflects the environmental concerns.	2d, 2c	The Draft FMP and Proposed FMP address water quality and quantity, and ecosystem health. The approved project is implemented by the Water Corporation.

Comment Number	Theme	Comment	Analysis category	Response
238	Catchment management	To achieve the best overall outcome, thinning regimes need to consider forest catchment management as a whole, including stream zones.	2d	The Draft FMP and Proposed FMP provide for silvicultural management of catchments. Stream reserves are informal reserves, not available for commercial timber harvesting, which provide for a range of values including water quality, biodiversity and visual amenity.
239	Catchment management	No silviculture for water until the completion of the Wungong Catchment trial.	2d	The Draft FMP (page 76) stated that 'silviculture for water production' would be dependent on public reporting and evaluation of the Wungong project. The Proposed FMP includes a management activity to this effect.
240	Catchment management	The high rate of deforestation and land degradation has a considerable impact on the increased salinity which rose dramatically. Recommends selective harvesting only, no clear-felling.	2d	Results of monitoring reported in the end-of-term audit of the current FMP 2004-2013 showed that streams in fully forested catchments remained fresh with low stream salinity. Appendix 14 in the Draft FMP outlined the range of different silvicultural methods utilised for different species and in differing conditions, and historic changes to these methods. The silviculture guidelines address ESFM criteria at a local scale and are based on considerable research, experience and monitoring, and currently being revised in the light of the expert panel review (2011).
241	Catchment management	The ever increasing plantations in the vicinity of Greater Kingston National Park are causing considerable concerns, particularly on the hydrology of the area and the wildlings of exotic species in the native forest.	2c	Any increase in plantations in this area is not on land vested in the Conservation Commission and is beyond the scope of the plan. There are programs to manage wildlings of exotic species on land vested in the Commission.
242	Catchment management	It is recommended that the Manjimup dam catchment be included as an area suitable for such silviculture practices as previously used to occur. Plan identifies that Harvey and Warren surface water basins are expected to develop deficit.s Proposes that thinning activities are extended to Drakesbrook, Harvey and Logue Brook dam catchments due to their importance for irrigated agriculture in the south-west).	1a	The Proposed FMP provides for 'silviculture for water production' and includes a management activity that specifies the conditions for implementation. The application of 'silviculture for water production' will be considered on a case-by-case basis.
243	Catchment management	Catchment management fails to recognise that mining and mining rehabilitation adversely impacts on streamflow. Mining impacts are inadequately dealt with in the plan with regard to water production. Catchment management plans associated with mining should be jointly prepared by the Water Corporation (where appropriate), the mining company and the FPC with input from DEC in the context of biodiversity and forest health. Catchment management plan should be prepared before mining commences.	2d	Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans. Review of criteria for rehabilitation and management of stand density in rehabilitated mine pits is supported in the Draft FMP (management activities 35 and 36, page 66 and retained in the Proposed FMP). Where appropriate, stand density will also be addressed in catchment management plans.

Comment Number	Theme	Comment	Analysis category	Response
244	Catchment management	Previous, current and future bauxite mining and restoration should also be considered. Stand densities need to be taken account of, especially since drought impacts have already been observed in some restored pits. Criteria for restoration need to be revisited, particularly in reference to stand densities in a drying and warming climate. Biodiversity values as well as water yield to riparian systems also need to be considered and included.	2d	Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans. Review of criteria for rehabilitation and management of stand density in rehabilitated mine pits is supported in the Draft FMP (management activities 35 and 36, page 66 and retained in the Proposed FMP). Where appropriate, stand density will also be addressed in catchment management plans.
245	Catchment management	How will the plan account for mining activities and its impact on streamflow?	2d	Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans. Review of criteria for rehabilitation and management of stand density in rehabilitated mine pits is supported in the Draft FMP (management activities 35 and 36, page 66 and retained in the Proposed FMP). Where appropriate, stand density of rehabilitation will also be addressed in catchment management plans.
246	Catchment management	Concerned about the salinity of water in Wellington Dam, and the consequences for irrigators. The salinity in the Wellington Dam area has increased, and it should be noted that logging there now occurs on steep slopes.	2d, 2c	Results of monitoring reported in the end-of-term audit of the current FMP 2004-2013 showed that streams in fully forested catchments remained fresh, with low stream salinity. Salinity problems in the Wellington Dam are a consequence of clearing for agriculture on lands other than those vested in the Conservation Commission.
247	Mining	Illogical to continue to encourage mining in our native forests, when mining is a major consumer of water. Recommend a moratorium on new mining activity and mining exploration in native forests; and a winding down of existing mining activity.	2c	Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans.
248	Mining	Recommends that areas of rehabilitated bauxite mining should be thinned within the period of this FMP to maintain tree health, to restore soil moisture and enhance stream flow and biodiversity.	2d	Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans. Review of criteria for rehabilitation and management of stand density in rehabilitated mine pits is supported in the Draft FMP (management activities 35 and 36, page 66 and retained in the Proposed FMP). Where appropriate, stand density will also be addressed in catchment management plans.
249	Silviculture guidelines	Jarrah silviculture guideline implies stand age is a principal factor to maintain streamflow.	2d	Noted.
250	Silviculture for ecosystem health	In the context of historical/legacy timber harvesting, the plan should include a silviculture program for ecosystem health (no programs or trials are suggested to thin young dense regrowth to assist re-establishing dominant trees; suggests seeking funding for the development of these programs and research (subcommittee of DEC, Centre of Excellence, Western Australian Forest Alliance and FIFWA to develop research priorities and trials).	2d	The Draft FMP and Proposed FMP provide for thinning of regrowth stands, including through 'silviculture for water production' and 'silviculture for ecosystem health'.

Comment Number	Theme	Comment	Analysis category	Response
251	Silviculture for water	Practice of thinning to create water run-off into dams is simplistic. Thinning basal area down to one third needs more reviewed research.	2d	The Draft FMP and Proposed FMP provide for thinning of regrowth stands, including through 'silviculture for water production' and 'silviculture for ecosystem health'. There has been considerable research over many decades on the effects of silvicultural practices on hydrology, biodiversity and other values. This research continues.
252	Silviculture for water	Supports Option 1 re 'silviculture for water production'.	2d	Noted. The Proposed FMP provides for 'silviculture for water production' and includes a management activity that specifies the conditions for implementation.
253	Silviculture for water	Forest thinning for water production is supported in principle. Design silviculture to maintain future growth of high value forest products; 'silviculture for water production' may be acceptable subject to detailed investigation, provided sustained yield is maintained but not increased.	2d	The Proposed FMP provides for 'silviculture for water production' and includes a management activity that specifies the conditions for implementation. Conditions include the approval of a catchment management plan which includes consideration of impacts on forest products.
254	Silviculture for water	There should be no reduction in the level of sustained yield for this plan as a result of the application of silviculture for water production. This would be a waste of sawlogs due to reduced industry capacity.	2d	The Proposed FMP provides for 'silviculture for water production' and includes a management activity that specifies the conditions for implementation. Conditions include the approval of a catchment management plan which includes consideration of impacts on forest products.
255	Silviculture for water	Supports and urges the addition of further irrigation water catchments in the development of silviculture for water production. Strongly supports Management Option 2 on page 75 with the extension of the activities proposed to also include the catchments of the Waroona, Drakesbrook, Logue Brook and Harvey dams.	1d	The Proposed FMP provides for 'silviculture for water production' and includes a management activity that specifies the conditions for implementation. The application of 'silviculture for water production' will be considered on a case-by-case basis.

Comment Number	Theme	Comment	Analysis category	Response
256	Silviculture for water	Supports Option 2 .Should be renamed 'Silviculture for Water Production and Ecosystem Health' as water generated by thinning is first made available for the ecosystem. Concerned that wide, densely stocked stream reserves negate the effect of thinning upslope. The option will be very expensive and recommends addressing the impediments on full FPC utilisation of the forest produce. The intensity of the thinning should be guided by the successful thinning trials that have been carried out in the Wungong catchment area. Recommends thinning of mining rehabilitation for water production. Use results from Wungong catchment trials. Concerns over lack of water and need to commence treatments designed to increase water yields. The benefits of this approach have already been proven in the trials that have been conducted in the Wungong catchment. Increased water yield from thinning will greatly improve the ecosystem health in the face of climate change and there will also be socio-economic benefits from the resulting wood products. Will produce a lot of non-sawlog material without a market, and may impact on commercial harvesting operations, and serious consideration should be given to non-commercial thinning of catchments. Costs for such operations should not be left simply for the forest manager to wear as a loss.	2d	The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions under which implementation could proceed. Conditions include the development of a catchment management plan which includes consideration of impacts on forest products. Stream reserves are informal reserves, not available for commercial timber harvesting, which provide for a range of values including water quality, biodiversity and visual amenity. Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans. Review of criteria for rehabilitation and management of stand density in rehabilitated mine pits is supported in the Draft FMP (management activities 35 and 36, page 66) and where appropriate stand density will also be addressed in catchment management plans.
257	Silviculture for water	Objective to thin for water production is at risk if consideration is not given to the management of stream zones.	2d	Stream reserves are informal reserves, not available for commercial timber harvesting, which provide for a range of values including water quality, biodiversity and visual amenity.
258	Silviculture for water	There is too much emphasis on silviculture to enhance water production. It needs to be stressed in the FMP that enhanced water production is also for biodiversity values not just potable water.	2d	The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions for implementation. Conditions include the development of a catchment management plan which includes consideration of a range of values, including biodiversity. The Draft FMP acknowledges that 'silviculture for water production' will first provide water to the environment.
259	Silviculture for water	Guidelines: The objective of long term streamflow should be coupled with a commitment to coppice and regrowth control.	2d	The Draft FMP (page 76) identifies coppice control as important to maintaining improvements in water availability.
260	Silviculture for water and ecosystem health	Separate out fire in silviculture for 'ecological health' from fire for silviculture for 'potable water'. They are different.	2d	The Draft FMP does not propose different fire management for these proposed silvicultural approaches, although it could be proposed to differ in different proposals. Fire can also provide a temporary benefit for water availability. Fire management occurs across areas of conservation reserves, State forest and timber reserves, including where silvicultural activities have taken or will take place.

Comment Number	Theme	Comment	Analysis category	Response
261	Silviculture for water and ecosystem health	Oppose both silviculture for ecosystem health and for water production; cannot support thinning for either water or ecosystem health, without further modelling and analysis of predicted impacts.	2e	Noted. The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions for implementation. Conditions include the approval of a catchment management plan which includes consideration of a range of values.
262	Silviculture for water and ecosystem health	Supports thinning for forest health and for water run-off.	2a, 2e	The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions under which implementation could proceed. Conditions include the approval of a catchment management plan which includes consideration of a range of values.
263	Silviculture for water and ecosystem health	Suggest deletion of "...managing vegetation density to enhance ecosystem health is only expected to be operationally or economically feasible over a very small proportion of the area covered by the plan" ... and that measures are identified to enable a significant amount of thinning for both water and ecosystem health.	2d	The Proposed FMP provides for thinning in regrowth stands, but depends on economic drivers, which could be markets for wood products that would be made available or the water supply. Silviculture guidelines are designed to provide ecosystem health and water benefits.
264	Silviculture for water and ecosystem health	Declining rainfall and climate change are a major issue for forested ecosystem health. Silviculture for ecosystem health/water production will reduce moisture stress in the northern jarrah forests.	2d	The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' to reduce ecosystem moisture stress and enhance resilience.
265	Silviculture for water and ecosystem health	Silviculture for water production is different to silviculture for environmental requirements and this should clearly be distinguished.	2d	The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions for implementation.
266	Silviculture for water and ecosystem health	It is irresponsible to apply the level of herbicide that will be required to carry out silviculture prescriptions in the guidelines Jarrah (2004), TA 4, Appendix 14 of the Draft plan in a Public Drinking Water Source Area (catchment).	2d	Silvicultural practices only use herbicides for approved uses, subject to relevant legislation and codes of practice.
267	Soils	There are no maps in the draft plan showing where Acid Sulfate Soils (ASS) (and potential ASS) are located. Nor are there maps showing high risk salinity areas. This is important as any disturbance resulting from logging would undoubtedly contribute to the spread of ASS and salinity; little regard is given to the dramatic changes in the water cycle that are wrought by removing native forest. Salinity is one of the most obvious problems caused by deforestation which will affect farms and the rest of the environment.	2d	The map of salt sensitivity zones is in the Draft FMP (page 79) and the map of high salt risk areas is available via the weblink in the Draft FMP (page 78). Management of, and policies and guidelines about, acid sulfate soils are identified in the Draft FMP (page 71) and retained in the Proposed FMP. Results of monitoring reported in the end-of-term audit of the current FMP showed that streams in fully forested catchments remained fresh with low stream salinity. Salinity problems in agricultural areas are a consequence of clearing for agriculture on lands other than those vested in the Conservation Commission.

Comment Number	Theme	Comment	Analysis category	Response
268	Soils	The impact of timber harvesting and climate change has not been fully explored in regard to the impact of soil biodiversity, which is very relevant for healthy and sustainable forests.	2d	The Draft FMP and Proposed FMP include a range of measures that seek to address climate change; guidance documents include a range of measures to protect soils from disturbance (e.g. that associated with timber harvesting) and ensure rehabilitation of affected areas. Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM.
269	Soils	Area of cutting should be reduced to reduce soil compaction. Logging increases compaction and should stop.	2d	The Draft FMP and Proposed FMP include a range of measures that provide for both proactive management, through the use of the Trafficability Index and outcomes based management in regard to soil compaction and timber harvesting. Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM.
270	Soils	Harvesting decisions in moist soil conditions are flawed, based on the Trafficability Index or the Soil Dryness Index. Recommends supporting outcomes based model for soil management. Concerned that the Trafficability Index should be outcome-based and not prediction based because it stops work in dry conditions based on wet conditions elsewhere. Questions the appropriateness of the use of the Soil Dryness Index to determine suitable harvest conditions. An outcomes-based model for soil management should replace the current Trafficability Index.	2d	The Draft FMP and Proposed FMP include a range of measures that provide for both proactive management through the use of the trafficability index and outcomes based management in regard to soil compaction and timber harvesting. The soil management system will continue to be refined, through review of the guidance documents, to provide for protection of soils whilst seeking to have the least impact on industry.
271	Thinning	Does not support thinning. Questions thinning, should regulate water extraction better in the first place. The Conservation Commission should set up a public dialogue to discuss the different value risks and expectations for silviculture for water and for ecosystem health, including the question of whether thinning increases the amount of water available for any given vegetation association.	2e	The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions for implementation. Conditions include the development of a catchment management plan which includes consideration of a range of values. A consultation period of 12 weeks was held to enable discussion and input on matters canvassed in the Draft FMP. Statutory public consultation is now complete.
272	Thinning	Opposed to widespread thinning.	2e	The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions for implementation. Conditions include the development of a catchment management plan which includes consideration of a range of values.
273	Thinning	Supports the thinning of dense forests to allow water to flow more freely through catchment areas.	2a, 2e	Noted. The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions for implementation.

Comment Number	Theme	Comment	Analysis category	Response
274	Thinning	The plan acknowledges the importance of reduced streamflow, but understates its seriousness. In the interest of streamflow a more flexible approach should be taken towards location and size of stream reserves. Draft FMP page 75 to allow forest and associated streams to self-adjust to a drying climate without management intervention. Acknowledge that forest stand density may, streams may not self-adjust. Therefore it will be necessary to maintain forest at a density less than they will adjust to without intervention.	2d	The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions for implementation. Conditions include the development of a catchment management plan which includes consideration of a range of values.
275	Water quality	Do not change practices requiring phased harvesting until those who are not engaged by and/or biased in favour of the timber industry, DEC or FPC, give expert opinion on sustainable forestry practices in a Western Australian context in light of climate changes from current modelling less than two years old. Needs to be closely monitored. Cautions the proposed change to phased thinning in partially cleared catchments, due to potential to affect ground water levels and quality and surface water quality in catchments, but suggests that the plan further explore water quality issues in the areas proposed as there is some evidence that the 'low salinity risk' is not accurate.	1a	Proposed changes to phased harvesting are supported by DEC and the expert silviculture review panel (as noted in Draft FMP, pages 77 and 78). DEC has followed up comments from the Department of Agriculture and Food (WA) and the Proposed FMP has been amended.
Climate change and carbon cycles				
276	Buffering and internal vegetation patches	The plan should define strategies and budget to increase buffering and internal patch revegetation.	2d, 2c	Revegetation within the area of the Draft FMP will be limited as there is little cleared land vested in the Conservation Commission. Management activities relevant to global carbon cycles are included in the Draft FMP (page 95), and retained in the Proposed FMP. The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. Resourcing and budgets are beyond the scope of the plan.
277	Carbon stores	The Draft FMP totally fails to manage the impact of logging operations on natural carbon stocks. The EPA must require a thorough audit of carbon stocks in south-west forests and ensure that the natural carbon stored in these forests is maintained, not degraded and destroyed by logging activities.	2d	Information relevant to this was included in the Draft FMP (pages 88-91) and retained in the Proposed FMP. The Proposed FMP includes a commitment to report on carbon stores in the next Draft FMP and a goal of seeking to sustain the contribution to global carbon cycles, with a range of management activities to that end.
278	Carbon stores	Reporting forest carbon stores should be based on projections over the full life-cycle of the production forest, taking into account the carbon stored in the resulting timber products. No mention of carbon sequestration.	2d	Full life-cycle analysis was not feasible for the Draft FMP. However, this will be considered for next Draft FMP. Carbon sequestration is factored into estimates and is mentioned in several places in the 'Climate change and carbon cycles' chapter in the Draft and Proposed FMPs.

Comment Number	Theme	Comment	Analysis category	Response
279	Carbon stores	Concerned about a drying climate in Western Australia and its effect (trees are dying). Concerned about URS Australia being a consultant for the FPC and recommendations to government from a global international perspective. Describes the potential for native forests to be carbon sinks.	2d	The effects of a drying climate have been considered in preparation of the Draft FMP (e.g., pages 84-86) and include information on carbon storage and the potential effects on native forest carbon stocks. An estimate is also included in the Proposed FMP.
280	Carbon stores	Areas where drought collapse has occurred and is likely to occur in the future need to be considered in the carbon models. Increased likelihood of severe fires on collapsed sites and further loss of carbon should be considered.	2d	Drought, fire and carbon stocks were factored into Draft FMP estimates.
281	Carbon stores	Should acknowledge that there is insufficient basis for making predictions about carbon stocks but that it is likely to decline. The plan should take into account that extreme bushfires will increase and give rise to further carbon emissions.	2d	The best available inventory, climate change, growth and carbon stock models were used in deriving the estimates in the Draft FMP. The potential effects of climate change on the intensity and frequency of bushfires were discussed in the Draft FMP and retained in the Proposed FMP.
282	Carbon stores	There appears to be some contradiction in the 'Climate change and carbon cycles' section claiming net increase in total carbon stored above and below ground in the live standing trees (Page 93), with the information in 'Productive Capacity' chapter where on Page 97 points (i) and (ii) highlight drier and warmer conditions, prolonged droughts and increases in bushfire frequency, intensity and scale. If events similar to the drought induced collapses observed in the northern jarrah forest in 2010/11 occur in the future, it is hard to understand how biomass carbon will increase as indicated in Table 6 (page 93).	2d	The best available inventory, climate change, growth and carbon stock models were used in deriving the estimates in the Draft FMP (pages 83-84; 91-94), with further details set out in supplementary information (to which a link was provided - see page 92). A net increase in forest carbon stocks is estimated given the age structure of the forest estate. The potential consequences of climate change are summarised in the Draft FMP (pages 84-86), and retained in the Proposed FMP. New key performance indicators have been developed for the Proposed FMP relating to knowledge of trends in climate and adaptive response, in addition to the key performance indicator included in the Draft FMP regarding improving knowledge of forest carbon stores (which has been retained in the Proposed FMP).
283	Carbon stores	Native forest logging, and forest burning, cause carbon emissions which contribute to global and local climate change. The Draft FMP does not say how much of this carbon will be released by the proposed forestry activities. This is a vital piece of information to have in hand before proceeding with the next 10 years of management. Recent Murdoch University research demonstrates that land clearing leads to reduced rainfall in its local area. Given that rainfall in the south-west has already declined 20% in the last 30 years, we should take a precautionary approach to native forest logging.	2d	The Draft FMP includes carbon stock estimates, which address the effects of native forest harvesting and regrowth and the effects of climate change, (pages 91-94). The best available inventory, climate change, growth and carbon stock models were used in deriving the estimates in the Draft FMP (pages 83-84; 91-94). The potential consequences of climate change on native vegetation ecosystems are summarised in the Draft FMP (pages 84-86), as retained in the Proposed FMP. New key performance indicators have been developed for the Proposed FMP relating to knowledge of trends in climate and adaptive response, in addition to the key performance indicator included in the Draft FMP regarding improving knowledge of forest carbon stores (which has been retained in the Proposed FMP).

Comment Number	Theme	Comment	Analysis category	Response
284	Carbon stores	Recent scientific research has demonstrated that Australia's native forests sequester more carbon than other forests, making them the optimal carbon store. Resources to tackle climate change should consider the carbon sequestration capacity of the south-west forests. The next FMP should not be sent to the EPA for assessment before a full carbon inventory of the south-west takes place.	2d	The Draft FMP includes estimates of the potential impacts of the plan on carbon stocks. The best available inventory, climate change, growth and carbon stock models were used in deriving the estimates as set out in the Draft FMP (pages 83-84; 91-94). EPA assessment of the FMP follows a statutory process as outlined in the EP Act. Resources and budgets are beyond the scope of the plan.
285	Carbon stores	Concern there has been misuse of the National Carbon Accounting System (NCAS) which is a model, not a measurement. How long will the emissions caused by logging remain in the atmosphere? The Department of Climate Change is responsible for greenhouse accounting (framework and data collection) as well as advising on climate policy and implementing climate programs. For the system of national (economic) accounts, the Australian Bureau of Statistics collects and presents statistics about the economy, independent of Treasury which advises on policy. A similar approach should be adopted for greenhouse accounts.	2d	The Draft FMP uses a robust methodology to estimate the potential impacts of the plan on carbon stocks.
286	Carbon stores	Information provided in the Draft FMP on carbon pollution from planned forest management activities is so selective as to be seriously misleading. The failure to disclose significant carbon emission sources resulting from the proposal is unacceptable, and constitutes a direct breach of the EPA guidance statement on greenhouse gas mitigation, and the requirement for maintenance of global carbon cycles as required under the ESFM principles established in the RFA.	2d	The Draft FMP uses a robust methodology to estimate the potential impacts of the plan on above and below ground live tree carbon stocks, and the estimates indicate that the carbon store in native forests will increase. The Draft and Proposed FMP include management activities for future reporting of carbon stocks, including establishing and measuring plots to improve precision of estimates. Further details were set out in supplementary information (to which a link was provided - see page 92 in the Draft FMP).
287	Carbon stores	The failure to recognize the significant soil carbon storage potential of native forests, (including the impacts of this carbon store by logging and the potential for this carbon store to continuously increase over time in undisturbed forests,) has led to faulty and perverse decisions regarding the management of forest carbon in the FMP.	2d	The Draft FMP uses a robust methodology to estimate the potential impacts of the plan on above and below ground live tree carbon stocks, and the estimates indicate that the carbon store in native forests will increase. The plan includes management activities to improve future reporting of carbon stocks. Estimates in the Draft FMP have assumed soil carbon does not/will not change significantly (see page 93). This is consistent with analysis published to date. There is limited information currently available on the level of soil carbon in WA's native forests. Work continues to improve knowledge in this area.
288	Carbon stores	Climate change is the greatest threat our region has ever been faced with and should be acknowledged and considered. The forests role as a carbon store far outweighs any perceived benefits to humans such as jobs. Tackle climate change using best practice. Less logging should occur because of falling winter rainfall and warmer temperatures.	2d	The Draft FMP includes a range of measures that seek to address climate change and promote the role of forests and forest products as carbon stores. The plan has been developed in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses.

Comment Number	Theme	Comment	Analysis category	Response
289	Carbon stores	Should value forests by including valuation of carbon credits as in Australian National University paper.	2d	The Draft FMP includes a management activity (retained in the Proposed FMP) to investigate opportunities that arise from an emerging carbon economy.
290	Carbon stores	Should put a price on carbon then maintaining forests will become economically beneficial. Reducing our native forest resources will compound climate change. The value of forests as stored carbon would exceed the value obtained by selling firewood, woodchips and or fuel for furnaces.	2c, 2d	The rules around the pricing of carbon are outside the scope of the Draft FMP. The Draft and Proposed FMPs include discussion about the contribution of forests and use of wood products to sequestration and mitigation of carbon emissions (e.g. see pages 88-91 of the Draft FMP). The Draft FMP includes a management activity (also retained in the Proposed FMP) to investigate opportunities that arise from an emerging carbon economy.
291	Carbon stores	The failure to assess the economic opportunities arising from the sale of carbon credits from avoided deforestation constitutes a breach of the CALM Act, ESFM principles and EP Act principles. The EPA should consider the foregone value of carbon credits resulting from logging activities as this matter lies within its jurisdiction.	2c, 2d	The rules around the pricing of carbon are outside the scope of the Draft FMP. The Draft FMP discusses and addresses the effect of timber harvesting on carbon stores and uses a robust methodology to estimate the potential impacts of the plan on above and below ground live tree carbon stocks, and the estimates indicate that the carbon store in native forests will increase. The Draft FMP includes a management activity (retained in the proposed FMP) to investigate opportunities that arise from an emerging carbon economy.
292	Carbon stores	Keep logging and the clearing necessitated by mining to the absolute minimum in native forests. Maintaining and increasing carbon stocks is fundamental to combating climate change. Logging and the clearing necessitated by mining and quarrying have a significant impact on natural carbon stocks. There will be a loss to the total biomass of carbon stocks from mining and infrastructure activity, as well as from logging.	2d, 2c	The Draft FMP uses a robust methodology to estimate the potential impacts of the plan, including timber harvesting and mining, on carbon stocks. The Draft FMP addresses the effect of timber harvesting on carbon stores. Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans. The Draft FMP seeks to transition to fewer basic raw material pits (page 145).
293	Carbon stores	There needs to be an independent assessment of carbon storage capacity and the impacts of logging on carbon storage.	2d	The Draft FMP uses a robust methodology to estimate the potential impacts of the plan on above and below ground live tree carbon stocks, and the estimates indicate that the carbon store in native forests will increase.
294	Carbon stores	Forest management for timber production results in maximum carbon sequestration. Forests store carbon at all the structural levels, including soil, leaf litter and trees. Destroying forests will result in release of CO ₂ and aggravate climate change.	2d	The Draft FMP acknowledges these points (pages 88-91) and an appropriate, broad range of precautionary measures to maintain the contribution of areas covered by the plan to global carbon cycles and to address climate change is included (in various sections).

Comment Number	Theme	Comment	Analysis category	Response
295	Carbon stores	The plan would benefit from including potential carbon sequestered by plantations, analysis of the impact for carbon sequestration of the proposed water yield silviculture and how biomass is adjusting to climate change.	2d	The Draft FMP uses a robust methodology to estimate the potential impacts of the plan on above and below ground live tree carbon stocks in native forests, including the effects of 'silviculture for water production'. The Department is not the custodian of information on carbon stocks for plantations so these were not included in the estimates. The potential consequences of climate change are summarised in the Draft FMP (pages 84-86) and an appropriate, broad range of precautionary measures to address climate change is included (in various sections).
296	Carbon stores	"Revegetation within the areas of the Draft plan will be limited as there is little cleared land vested in the Conservation Commission of WA" page 89...disagree, there are many areas.	2d	Revegetation within the area of the Draft FMP will be limited as there is little cleared land vested in the Conservation Commission.
297	Carbon stores	Given the unique role that forests can play in managing global carbon cycles as well as the economic opportunities arising from the sale of carbon credits, maintaining and enhancing the carbon sequestration and storage potential of south-west forests must be a primary goal of the FMP.	2d	The plan addresses the range of ESFM values, including carbon cycles. The Draft FMP contains the first indicative estimates of native forest carbon stocks on lands vested in the Conservation Commission in the plan area, including areas subject to native forest timber harvesting. The Draft FMP is not the vehicle for determining an economic value for forest carbon. Notwithstanding this, the economic value of forest carbon could be investigated if and when a more certain carbon market emerges, and the Draft and Proposed FMPs include a management activity to this end.
298	Carbon stores	The reliance on establishing carbon monitoring plots during the term of the FMP as a replacement for more accurate assessment and mitigation of carbon pollution at the planning stage is unacceptable and does not comply with the precautionary principle.	2d	The Draft FMP includes a range of management activities, retained in the proposed FMP, that contribute to mitigation of, and adaptation to, climate change.
299	Climate change	Suggests a proposed monitoring program to record drought indicators. Such a program should include an annual aerial measurement of leaf area index, permanent bores for recording the depth of water tables and an expansion of the FORESTCHECK program.	2d	A KPI in the Draft FMP, retained in the Proposed FMP, includes the monitoring of groundwater. The plan seeks to maintain and extend FORESTCHECK (e.g. Draft FMP page 50), retained in the Proposed FMP. Leaf area index is monitored by other groups.
300	Climate change	Studies need to be undertaken to ascertain the contribution of tree felling to declining rainfall.	2d	The Draft FMP refers to the work of the Indian Ocean Climate Initiative, in which the Department has been a partner. IOCI has studied the causes of climate change in the region and state that rainfall reductions are explained by major changes in global atmospheric circulation and temperature.
301	Climate change	Logging contributes to climate change.	2d	The Draft FMP discusses and addresses the effect of timber harvesting on carbon stores and uses a robust methodology to estimate the potential impacts of the plan on above and below ground live tree carbon stocks, and the estimates indicate that the carbon store in native forests will increase.

Comment Number	Theme	Comment	Analysis category	Response
302	Climate Change	An audit of loss of oxygen, of loss of carbon sequestration, and of carbon stocks is needed.	2d, 2e	The Draft FMP uses a robust methodology to estimate the potential impacts of the plan on above and below ground live tree carbon stocks, and the estimates indicate that the carbon store in native forests will increase.
303	Climate change	Notes effects on forest decline associated with climate change: decreased rainfall; increased number and intensity of frosts, which can kill young trees and parts of mature trees; more rain during summer when it quickly evaporates and also increases the range and growing time of <i>Phytophthora</i> dieback; warmer than average winter maximum temperatures which are allowing pest species such as gumleaf skeletoniser caterpillars to breed two generations in a year; <i>Phytophthora cinnamomi</i> and other species of <i>Phytophthora</i> , which are attacking more and more plant species; the fungus <i>Armillaria luteobubalina</i> , which is invading karri regrowth and, with other fungi, degrading the wood and making it unsuitable for sawn timber. During one lower than average rainfall year in 2010, many mature karris in national parks in the Donnelly District were killed by <i>Armillaria</i> due to stress; the fungus <i>Quambalaria coyrecup</i> is killing marri trees of all ages and in all land tenures and categories; the fungus <i>Quambalaria piterika</i> is attacking marri blossom and nuts, with disastrous consequences for cockatoos and honey producers.	2d	The Draft FMP has been developed in line with the principles of ESFM as detailed in the CALM Act, including biodiversity conservation and ecosystem health, which are fundamental considerations. As acknowledged in the Draft FMP (page 51), impacts from various factors may be cumulative and/or interact in ways that are not always well understood. The Draft and Proposed FMPs propose a renewed focus to prioritise the management of pests and diseases to complement the approach that has been adopted for weeds. This will help minimise their impact on the health and vitality of ecosystems and reduce the risk of introduction or naturalisation of weeds, pests and exotic pathogens. The approach will consider the range of <i>Phytophthora</i> species and other diseases impacting on ecosystems. The Draft and Proposed FMPs provide for 'silviculture for ecosystem health' to enhance water availability to identified areas.
304	Climate change	Forestry assists to mitigate effects of climate change - it doesn't add to the problem. Carbon stored in forest products and in regrowing forests. In the long term, a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit.	2d	The Draft (pages 89-90) and Proposed FMPs acknowledge these points.
305	Climate change	Concern over warming and drying climate. No strategy for dealing with an increasingly drier future. Supports the mid-term audit report's recognition that climate change has not been adequately addressed in the FMP and that to wait until the end of this FMP to address climate is not an option.	2d	The potential consequences of climate change are summarised in the Draft FMP (pages 84-86) and an appropriate, broad range of precautionary measures to address climate change is included (in various sections). For example, management activities pages 49 and 50 of the Draft FMP (retained in the Proposed FMP) are specifically aimed to contribute to mitigation of, and adaptation to, climate change. 'Silviculture for ecosystem health' and 'silviculture for water production' are put forward as responses to climate change and the more focussed approach put forward for management of ecosystem health is also a response to the threat of climate change. The 'high severity' climate change projection has been used in developing the Proposed FMP.

Comment Number	Theme	Comment	Analysis category	Response
306	Climate change	There is no comprehensive statement of the current level of knowledge nor an indication of what the future may hold in the Draft FMP which must take into account trends of reduced rainfall and projected climate change. While the plan acknowledges the impacts of climate change it has consistently understated the implications in relation to forest and forest management, both at a regional and local level and in context of 'cumulative' impacts.	2d	Information on predicted climate change is addressed on pages 83-84 of the Draft FMP. As acknowledged in the Draft FMP (page 51), impacts from various factors may be cumulative and/or interact in ways that are not always well understood. The potential consequences of climate change are summarised in the Draft (pages 84-86) and Proposed FMPs, and an appropriate, broad range of precautionary measures to address climate change is included in various sections.
307	Climate change	Differing climate change scenarios listed in Table 7 are irrelevant. All available climate change indicators suggest that the rate of climate change is tracking at or above the worst-case scenarios developed by the Intergovernmental Panel on Climate Change (IPCC). This should be recognised in all projections of forest productivity in the Plan. Rainfall trends in the south-west are significant and planning should be on the basis of the high climate change scenario.	2d	Noted. The 'high severity' climate change projection has been used in developing the Proposed FMP.
308	Climate change	Recommends greater level of research into biodiversity and the effects of climate change and other environmental factors	2d	The Draft and Proposed FMPs include management activities to increase understanding of biodiversity values (e.g., the Draft FMP seeks to maintain and extend FORESTCHECK - pages 49-50).
309	Climate change	Adaption and mitigation, vulnerability of tuart forest to climate change, self thinning and amount of carbon are key issues to be addressed. Should review recent publications. A more proactive stance needs to be taken in the development of an understanding of the carbon stocks in different forest types.	2d	The Draft and Proposed FMPs include management activities to improve understanding of carbon stocks and the impact of climate change on native ecosystems.
310	Climate change	Identifies a risk assessment framework which is recommended as a valuable tool for the forest management plan to assess potential consequences of climate change to assist with decision making across a range of values; including soil and water, water quality and ecological impacts from hydrology.	2d	A risk assessment framework may be particularly relevant to 'silviculture for ecosystem health' and 'water production and other proposed management activities, and will be considered as appropriate in their implementation.
311	Climate change	All forests are in decline due to climate change and rainfall projections are based on out of date data. Even without deliberate 'managed' destruction through logging, "thousands of native trees have been killed by drought across the south-west during the past 20 years. Stress on trees due to global warming and reduced water availability. States out of date rainfall data have been used and up to date figures must be used.	2d	The best available/most recent Indian Ocean Climate Initiative /CSIRO climate data and projections have been used.

Comment Number	Theme	Comment	Analysis category	Response
312	Climate change	FMP does not take into account declining rainfall.	2d	Information on predicted climate change is addressed on pages 83-84 of the Draft FMP. The best available/most recent Indian Ocean Climate Initiative /CSIRO climate data and projections have been used in the Draft FMP. The potential consequences of climate change are summarised in the Draft (pages 84 to86) and Proposed FMPs and an appropriate, broad range of precautionary measures to address climate change is included in various sections.
313	Micro-climate	FMP needs an assessment of the effect of logging on micro-climate.	2d	Numerous studies have investigated the effects of timber harvesting on micro-climate, which have informed development of the plan and subsidiary guidance documents.
Productive capacity				
314	Firewood	Supports public firewood collection (page 117) Management Options 1 and 2 and suggests that they seek to make best use of a resource not attractive to the commercial operators and seek to discourage members of the public accessing protected areas and spreading disease. Options 1 and 2 appear to be more acceptable in terms of continuation of public access to firewood areas and catering for future population growth. Public firewood areas nearer to the Perth/Peel are limited by access constraints imposed by safety requirements associated with bauxite mining and access restrictions to Disease Risk Areas. Alcoa could also be requested to consider clear felled areas from mining operations to be strategically made available for firewood collection with DEC being responsible for manage stockpiled areas without compromising public safety.	2e	In the Proposed FMP, it is intended that the Department, and where appropriate in conjunction with the FPC, implement trials in selected areas, of the three Management Options identified in the Draft FMP, being: <ul style="list-style-type: none"> • the movement of firewood from disease risk areas, protectable areas or ‘clean on entry’ road sections – Draft FMP Management Option 1; • non-commercial thinning of selected areas and removal of non-commercial plantation plots - Draft FMP Management Option 2; and • where firewood would only be available to the public from commercial suppliers - Draft FMP Management Option 3 . Subject to the results, the Department may seek to progressively reduce public firewood areas. Even so, it is likely that some public firewood areas would still be made available during the term of the plan. Some wood from mining operations is already made available for firewood contractors.
315	Firewood	Recommends adopting Management Option 2.	2e	See text in Proposed FMP, above.
316	Firewood	Recommends adopting Management Option 2.	2e	See text in Proposed FMP, above.
317	Firewood	Supports firewood Management Option 2.Creating firewood by thinning has merit, provided the cost of a firewood permit does not rise dramatically. This method is already in practice in the Wungong catchment trial area, south of Jarrahdale Road. In winter 2012, large quantities of small diameter trees which were notch poisoned some four years ago provided excellent quality public firewood.	2e	See text in Proposed FMP, above.
318	Firewood	Supports firewood Management Option 3	2e	See text in Proposed FMP, above.
319	Firewood	Does not support firewood Management Option 3. A move to a system where firewood is only available from commercial operators is totally unacceptable, effectively banning collection of firewood by the public.	2e	See text in Proposed FMP, above.

Comment Number	Theme	Comment	Analysis category	Response
320	Firewood	Does not support firewood Management Option 1. Concerned DEC will make collecting firewood by the public more difficult and costly, or an activity which is banned altogether. Does not support any of the options relating to public firewood access. Thinning operations in Wungong and further proposed thinning will provide significant resource of public firewood. Opposes any option that will raise the cost to the public to collect firewood. Community demand for firewood remains strong. Logical for the draft plan to explore ways to encourage the public to use more wood, not less. The quantity of “other bole” timber, which includes firewood grade wood and which is available to harvested, is way in excess of the amounts required for domestic firewood purposes. The Conservation Commission/DEC need to accept that: 1. a proportion of the public will always want to collect firewood for their own use; 2. firewood collection it is an important recreational activity for many people who like to combine a firewood collection day with a family bush BBQ or picnic; and 3. demand for firewood will continue to increase as energy costs from non-renewable fossil fuels continue to rise faster than inflation. Conservation Commission should accept that collection of firewood by the public from State forest is a right that is steeped in history.	2e	See text in Proposed FMP, above.
321	Firewood	Suggests modifying the firewood supply 'policy' based on proximity to major centres of population and access to alternative energy sources.	2e	See text in Proposed FMP, above.
322	General	Page 98, dot point 3-it is beyond the scope of the FMP to say that the FPC should pursue new markets for this material (non-sawlog and regrowth).	2d	Text referred to is background information and relates to the ability to achieve silvicultural objectives, which is fundamental to ESFM.
323	General	Strongly opposes anagement Action 91 (page 138) ... not a role of DEC to support a viable timber industry.	2d	The management activity relates to DEC's role in the harvest planning process.
324	General	Regarding activity 79.3 and 79.4 (use of other seed sources), there must be full assessment of the proposal including public involvement.	2d	The approach outlined in the Draft FMP is retained in the Proposed FMP.
325	Harvesting native forest	Draft FMP fails to present the commercial role (and obligations) of timber production. Draft FMP should recognise the importance of commercial activity within the forests and use funds generated from it for public forest management.	2d	Royalties paid to FPC are used to help it meet its responsibilities for forest management.
326	Harvesting native forest	There is no commitment to ensure the furniture industry has a reliable source of supply as there was in last (current) FMP. There are options to ensure this long term certainty.	2c	End-use of harvested logs is beyond the scope of the plan.

Comment Number	Theme	Comment	Analysis category	Response
327	Harvesting native forest	The Draft FMP is clearly a political document primarily focused on giving effect to the apparent policy of the current government, i.e. to maintain or increase subsidised log supply to the declining native forest logging industry.	2d	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM. The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses. Biodiversity conservation and protection of environmental values are fundamental considerations.
328	Harvesting native forest	The forest logging industry is uneconomic. It does not adequately price logs. It fails to account for the full costs of logging (including carbon). Poor utilisation of large volumes of high quality jarrah for use as railway sleepers for Brookfield Rail and charcoal for SIMCOA. FPC financial position not calculated correctly, e.g. forest revaluations, profit figures, interest payments, costs not met, change in accounting procedures.	2c	The issues raised are the responsibility of the FPC and beyond the scope of the FMP.
329	Harvesting native forest	The marketing of forest residues is a critical component of timber production within a forest management plan as it allows the appropriate (and necessary) silvicultural management of forests to achieve the stated goals whilst also providing a commercial return to the forest owner (Government).	2c	This is a responsibility of the FPC and is beyond the scope of the FMP. However, as noted in the Draft and Proposed FMPs, the FPC has a role to play in the pursuit of new markets for non-sawlog material.
330	Harvesting native forest	WA native forests managed for diverse values, all are important.	2a	Noted. The Draft and Proposed FMPs have been developed in line with the principles of ESFM as detailed in the CALM Act, and seek to achieve an appropriate balance between various values and uses.
331	Harvesting native forest	Strongly opposed to any development of a new 'low value' native forest logging industry. Low-value products should not be supplied by high value forests. Timber can be sourced from sustainable alternatives, e.g. plantations and farm forestry. Poor utilisation, use wood for high value products instead. Don't turn old trees into woodchips or junk mail.	2c, 2d	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ecologically sustainable forest management (ESFM) and the Draft and Proposed FMPs provide for a native forest products industry, which utilises a range of log types. There are a range of potential benefits to improved utilisation of the available wood resources, including improved capacity to adapt to climate change with ecosystem health and water supply benefits, a greater contribution to climate change mitigation, improved silvicultural outcomes, increased sawlog production, and greater socio-economic benefits. There are existing plantations within the plan area. Utilisation of felled trees is monitored by the Department, and end-use of harvested logs is beyond the scope of the plan.
332	Harvesting native forest	Find alternatives to bio-fuel. Better use of recycled wood or paper instead.	2c	End-use of harvested logs is beyond the scope of the plan. No biofuel is currently produced from logs sourced from either native forests or plantations.

Comment Number	Theme	Comment	Analysis category	Response
333	Harvesting native forest	Recommends involvement in a project to determine if bio-char from forest residue can improve tree plantation productivity. The production of bio-char from forest residues can make a positive contribution, not only to improved tree plantation productivity but also the wider agricultural field.	2c	End-use of harvested logs is beyond the scope of the plan. However, as noted in the Draft and Proposed FMPs, the FPC has a role to play in the pursuit of new markets for sawlog and non-sawlog material.
334	Harvesting native forest	The industry needs to be proactive in searching for use for second grade logs.	2c	End-use of harvested logs is beyond the scope of the plan. However, as noted in the Draft and Proposed FMPs, the FPC has a role to play in the pursuit of new markets for sawlog and non-sawlog material.
335	Harvesting native forest	Commercial sale of wood product from thinnings should be encouraged.	2c	End-use of harvested logs is beyond the scope of the plan. However, as noted in the Draft and Proposed FMPs, the FPC has a role to play in the pursuit of new markets for sawlog and non-sawlog material.
336	Harvesting native forest	There is no justification for increasing the logging of native forests to make up the shortfall in available plantation timber.	2e	The Draft and Proposed FMPs do not propose this.
337	Harvesting native forest	In the context of climate change and species extinction, logging should be stopped or limited to sustainable use of high value forest products.	2e	The Draft FMP has been developed in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses, including commercial activities. The potential consequences of climate change are summarised in the Draft FMP (pages 84-86) and the Proposed FMP. An appropriate, broad range of precautionary measures to address climate change is included (in various sections). End-use of harvested logs is beyond the scope of the plan.
338	Harvesting native forest	Does not support any further logging of south-west forests. The plan does not protect the forests and should be rejected. Logging quota (and logging in general) is unsustainable. Logging of native forest should be completely phased out by 2013 and the FPC dismantled. Further that Forest Stewardship Council accreditation is established. Community values rather than logging. Draft FMP is deficient in that it allows logging. Majority of West Australians opposed to logging.	2e	The CALM Act provides for a management plan for State forest and timber reserves to have a purpose of native forest timber production on a sustained yield basis. Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM and the Draft FMP provides for a native forest products industry. Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review. The FPC has a certified environmental management systems (refer Draft FMP page 148) and is also exploring FSC certification.
339	Harvesting native forest	Alternative crops - hemp, bamboo, etc.	2c	These are issues beyond the scope of the plan.
340	Harvesting native forest	FMP needs to play a more significant role in informing the community on timber harvesting activities (area to be logged and when).	2d	The Draft and Proposed FMPs provide for the development of three yearly and annual rolling timber harvest plans. These plans identify the coupe and selected year of operations and are made available for public comment. Coupe planning involves engaging with local stakeholders, including neighbours to harvesting operations.

Comment Number	Theme	Comment	Analysis category	Response
341	Harvesting native forest	Supports selective logging of all forests excluding national parks. Agrees with Forest Industries Federation of Western Australia's (FIFWA) submission.	2d	Habitat values and biodiversity are provided for at three levels; formal reserves; forest conservation areas, informal reserves and fauna habitat zones; and retention strategies at the local level. The changes to silvicultural practice as outlined in the Draft FMP are supported and are to be included in revised silviculture guidelines.
342	Harvesting native forest	The sustainability approach to logging is supported; support sustained harvesting of native forests; the forest is the only truly renewable resource.	2a	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM.
343	Harvesting native forest	Plantations instead of native timber harvesting.	2c	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM.
344	Harvesting native forest	As with previous FMP the Draft FMP utterly fails to establish the ecological sustainability of what is proposed in terms of log volumes and the 'silvicultural' practices used, i.e. clear-felling and other highly destructive logging methods. Draft FMP fails to establish the ecological sustainability. Proposed log volumes and the 'silvicultural' practices are highly destructive logging methods. Continued logging is unnecessary, financially unviable and unsustainable. Opposed to thinning.	2e	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM. The changes to silvicultural practice as outlined in the Draft FMP are supported and are to be included in revised silviculture guidelines. Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield has been subject to an independent review, which will be made publically available.
345	Harvesting native forest	FPC and DEC statistics indicate that under the current FMP (which assumed a return to 1970s rainfall levels) a substantial proportion of jarrah and karri logs were intended to be used for sawn timber. Yet fewer and fewer logs are usable for this purpose. They are simply too small, flawed, and damaged by natural processes. Thus they are used for firewood, charcoal and chips for paper pulp. Page 98 identified values and threats Point (dot) 4. A viable industry has been supported at the expense of overcutting and general degradation of forests since we first started cutting them. The sizes of the trees have gotten smaller.	2d	The Conservation Commission has a role to audit the implementation of management plans, in this case as reported in the mid- and end-of-term audits of the current FMP, which have informed development of this plan. Habitat values and biodiversity are provided for at three levels: formal reserves; forest conservation areas, informal reserves and fauna habitat zones; and retention strategies at the local level. This includes measures in the Draft FMP, as retained in the Proposed FMP, that seek to maintain stand structural complexity and landscape heterogeneity. Silvicultural practices and prescribed burning are developed based on consideration of natural disturbance regimes. Research and long-term monitoring of the effects of timber harvesting on biodiversity, including that conducted through the Department's major monitoring program, FORESTCHECK, shows that its impacts on the biodiversity groups monitored, are relatively transient (Abbott and Williams, 2011). Also, monitoring of regeneration of forest following harvesting by the FPC and by the Department (including through FORESTCHECK) has found that regeneration is being effectively achieved across both the karri and jarrah forests. Nevertheless, additional provisions to enhance regeneration outcomes will be included in the revised silviculture guidelines, as outlined in the Draft FMP (see pages 120 and 122).

Comment Number	Theme	Comment	Analysis category	Response
346	Harvesting native forest	Urges government to encourage and support the use of timber products resulting from catchment thinning operations as an addition to the timber volumes, rather than leaving felled or poisoned trees to waste.	2c	Marketing of logs and end-use of harvested logs is beyond scope of the plan. However, as noted in the Draft and Proposed FMPs, the FPC has a role to play in the pursuit of new markets for sawlog and non-sawlog material.
347	Native forest logs	Concerned that the only way to get logs is through the auction system which is too costly.	2c	Log pricing, supply contracts and end-use of harvested logs is beyond scope of the plan.
348	Native forest logs	Requests an increase of 4,000 cubic metres per annum in 1st and 2nd grade jarrah sawlogs. Increased opportunity for small innovative companies with high utilisation.	2c	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield will be subject to an independent review. Marketing of logs and end-use of harvested logs is beyond scope of the plan. The process of log allocation is not DEC's responsibility and is beyond the scope of the plan.
349	Native forest logs	Requests that timber cleared for mining activities be made available to the native timber industry.	2d	Wood from mine clearing is available for sale to customers of the FPC.
350	Plantations	Supports (in principle) expanding pine plantations estate in suitable areas to meet state supply obligations.	2d	Management activity 52 in the Draft FMP, retained in the Proposed FMP, seeks to maintain areas of plantation estate required to meet State Agreement Act supply requirements.
351	Plantations	The reference to permanently removing and rehabilitating the Pinjar and Yanchep plantations should be removed from the Draft FMP.	2d	As noted in the Draft FMP (page 31): <i>"the 2011 agreement between the Commonwealth and State governments to conduct a strategic assessment of future development in the Perth and Peel regions, under the EPBC Act. This work will focus on the likely urban, industrial and infrastructure developments required for future population growth in the area, and consider issues related to the protection of Carnaby's cockatoo, including the progressive removal of the Gnangara, Pinjar and Yanchep pine plantations and subsequent rehabilitation and land use in these areas."</i> This text does not confirm that there will be plantation removal in these areas, but notes the assessment will consider its possible impacts. The text has not been retained in the Proposed FMP.
352	Plantations	Concerned over declining area of softwood plantations and areas that may be forced to close, with significant socio-economic cost, should an alternative resource not be available. Concerned area of pine plantations is decreasing rather than increasing. Supports (in principle) expanding pine plantations estate in suitable areas to meet state supply obligations.	2d	The Draft FMP (management activity 52) seeks to prevent further reductions in areas of plantations; however, some causes are beyond its scope. This is retained in the Proposed FMP.

Comment Number	Theme	Comment	Analysis category	Response
353	Plantations	Supports minimum of extra 100 hectares per annum of replanting of plantations. Proposes that 50 per cent of minesite rehabilitation is reforested with pine. Proposes establishing softwood/hardwood plantations on former minesites in high rainfall areas or saline recovery catchments, allowing for productive use without compromising conservation values (will need to be mindful of catchment impacts).	2c	This is beyond the scope of the plan. Current policy requires that minesite rehabilitation consist of native species.
354	Plantations	Suggests expanding on management activity 51, page 100 of the Draft FMP to seek out mechanisms to encourage investment in new pine plantation establishment.	2c	The issue of investment is beyond the scope of the plan.
355	Plantations	The royalty structure for pines under State Agreement Acts needs to be revisited to ensure improved management OR a strategy is needed to ensure a reasonable price for this resource to ensure future availability.	2c	The issue of royalty structures is beyond the scope of the plan.
356	Regrowth	Suggests that harvesting of large trees in regrowth constitutes harvesting old-growth forest. Does not agree that harvesting occurs only in the regrowth forests. Recent press claims of many old karri logs in the yard of the chip mill was proved to be nearly 600 years old. Thousands of ancient trees have been chipped. Claim that 'harvesting' occurs only in the regrowth forests by Minister for Forestry is misleading Parliament. Helms block old-growth forest would have been destroyed if not for the public submission.	2e	Old-growth forest is protected from timber harvesting. Old-growth forest is defined in the Draft (and Proposed) FMP as 'ecologically mature forest where the effects of unnatural disturbance are now negligible. The definition focuses on forest in which the upper stratum or overstorey is in a late mature to senescent growth stage'. In other words, the forest is dominated by trees comprising a canopy of older, senescing trees. Patches of forest larger than two hectares are recognized for mapping and management purposes. Consequently, stands that have been cutover in the past and retain only a scattered representation of trees in the late mature to senescent growth stages would not constitute old-growth forest. Formal and informal reserves, various other measures in the Draft FMP and silviculture guidelines, together serve to maintain stand structural complexity, landscape heterogeneity and resilience. Old-growth forest is protected from timber harvesting, and the plan proposes this be the case for all disturbance activities (management activity 6.2, page 47, retained in the Proposed FMP). Trees of various species, ages and sizes are also retained as habitat trees. Information about the age of karri trees referred to in the media is not consistent with DEC measurements of tree age as determined from counting growth rings of hundreds of large trees in karri forest. The oldest karri tree found to date by DEC is approximately 360 years old. Most trees in old-growth karri forest are estimated to be between 150 and 250 years old.
357	Regrowth	Forests are successfully regenerating.	2d	Noted.

Comment Number	Theme	Comment	Analysis category	Response
358	Regrowth	The forests are and have always been depleted of substantial trees faster than they can regrow. Re-growth forests (particularly jarrah) are of extremely poor quality, consisting mainly of multi-stemmed coppice; Incorrect to say native forest can be logged as long as new trees are planted. Intensively logged areas indicate poor regeneration. Current logging in the last old-growth high conservation value forest areas must stop.	2e	Harvest is based on and occurs within the limits of sustained yield. Monitoring of regeneration has found it is being effectively achieved. This matter was examined by Burrows et al 2011 (silviculture review panel), who found that <i>'recruitment is rarely an issue'</i> (Draft FMP, page 120). Nevertheless, additional provisions to enhance regeneration outcomes will be included in the revised silviculture guidelines, as outlined in the Draft FMP (see pages 120 and 122). Formal and informal reserves, various other measures in the Draft FMP and silviculture guidelines, together serve to maintain stand structural complexity, landscape heterogeneity and resilience. Old-growth forest is protected from timber harvesting, and the plan proposes a review of planning processes for disturbance activities on all land categories to ensure a uniform approach for assessment of old-growth forest status (e.g., Draft FMP management activity 6.2, page 47, retained in the Proposed FMP). Trees of various species, ages and sizes are also retained as habitat trees.
359	Regrowth	Limit logging of native forest due to regeneration being more difficult due to climate change. Limit clearing for mining for the same reason.	2d	Monitoring of regeneration has found it is being effectively achieved. This matter was examined by Burrows et al 2011 (silviculture review panel), who found that <i>'recruitment is rarely an issue'</i> (Draft FMP, page 120). Nevertheless, additional provisions to enhance regeneration outcomes will be included in the revised silviculture guidelines, as outlined in the Draft FMP (see pages 120 and 122). Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans.
360	Salvage harvest	A streamlined approval process needs to be developed to assist in salvage.	2e	A streamlined approval process so that salvage can be undertaken in a timely way is supported in the Proposed FMP. It is intended that the decision to salvage any affected areas and determine if any salvaged wood will count towards allowable cut, be based on a case-by-case evaluation by the Department of the likely public benefit. In doing so, the Department would consider the costs and ability of affected areas to successfully regenerate and/or be successfully rehabilitated in the absence of salvage harvest, and provide for a range of ESFM values.
361	Salvage harvest	Supports Salvage Management Option 1.	2e	Noted. The Proposed FMP supports salvage of wood products from areas impacted by bushfires and other events and that in some cases not all of the wood products should count towards the allowable cut.
362	Salvage harvest	Should be greater upward flexibility to allow for the harvest to cater for possible increased mortality due to moisture stress.	2e	Noted. The Proposed FMP supports salvage of wood products from areas impacted by bushfires and other events and that in some cases not all of the wood products should count towards the allowable cut.

Comment Number	Theme	Comment	Analysis category	Response
363	Salvage harvest	A better process is needed to allow access to timber classified as salvage wood. Salvage wood should not be included in the calculation of wood available for production (i.e. sustained yield). Salvage wood should be outside the sustained yield. Salvaging wood should be supported by providing access to informal reserves following major disturbance, and an expedited approvals process should be developed with the FPC to rehabilitate areas following salvage operations.	2e	A streamlined approval process so that salvage can be undertaken in a timely way is supported in the Proposed FMP. It is intended that the decision to salvage any affected areas and determine if any salvaged wood will count towards allowable cut, be based on a case-by-case evaluation by the Department of the likely public benefit. In doing so, the Department would consider the costs and ability of affected areas to successfully regenerate and/or be successfully rehabilitated in the absence of salvage harvest, and provide for a range of ESFM values.
364	Salvage harvest	Supports Management Option 2.	2e	Noted. The Proposed FMP supports salvage of wood products from areas impacted by bushfires and other events and that in some cases not all of the wood products should count towards the allowable cut.
365	Salvage harvest	Rejects salvage logging.	2e	Noted. The Proposed FMP supports salvage of wood products from areas impacted by bushfires and other events and that in some cases not all of the wood products should count towards the allowable cut.
366	Silviculture guidelines	Silvicultural guidelines should be amended to incorporate the following guiding principle: Managing the forest to produce future sawlogs.	1e	This matter will be considered in the revision of the silviculture guidelines during 2013. DEC will consult with key agencies as appropriate during revision of silviculture guidelines during 2013.
367	Silviculture guidelines	Does not believe that the proposed changes within the Draft FMP are warranted, particularly changes to silvicultural prescriptions and increased reservation of forests. Concerns in relation to economic activity in the region.	2e	This matter will be considered in the revision of the silviculture guidelines during 2013. Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to independent review.
368	Silviculture guidelines	The Draft FMP should have addressed alternative options to intensive and repetitive high disturbance methods of broad scale gap and shelterwood treatments for tree establishment, recruitment and development in favour of maximising protection of forest ecological values and rendering existing regrowth more resilient and less vulnerable to future collapse under likely increasing severity of adverse climate change conditions.	2d	Silvicultural practices were subject to a review (Burrows et al 2011, silviculture review panel), with recommendations for some changes to practice, as discussed in the Draft FMP, to be included in revised silviculture guidelines to enhance protection for ecological values. Potential consequences of climate change are summarised in the Draft FMP (pages 84-86) and an appropriate, broad range of precautionary measures to address climate change is included (in various sections).
369	Silviculture guidelines	Changes to silviculture guidelines should not proceed until an analysis of the benefit of change and effect of change has occurred, in consultation with DoW (water impacts) and FPC (wood impacts). (Should agreement not be reached between agencies, determination is with the Minister for Environment and other relevant Ministers).	2d	DEC will consult with key agencies as appropriate during revision of silviculture guidelines during 2013.
370	Silviculture guidelines	Clarify the intention of the Silviculture Panel report relating to prohibiting the removal of leaf and fine branch material (less than 150 mm diameter). This would have a range of management implications, including impact on the economics of thinning, and create excessive thinning debris with consequent fire risk	2d	DEC will consult with key agencies as appropriate during revision of silviculture guidelines during 2013.

Comment Number	Theme	Comment	Analysis category	Response
371	Silviculture guidelines	Recommends broad-acre silvicultural approach involving thinning and coppice control or commercial logging under a selection system.	2e	This matter will be considered in the revision of the silviculture guidelines during 2013.
372	Silviculture guidelines	Sustained yield should be based on best practice silvicultural management, assuming full access to forest areas, full implementation of silvicultural objectives, thinning for water and exclusion of recovery of dead trees from fire or climate change.	2d	This matter will be considered in the revision of the silviculture guidelines during 2013. Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to independent review.
373	Silviculture guidelines	FORESTCHECK appears to be indicating that most effects of timber harvesting have become negligible in the near-term, with soil disturbance/compaction appearing be the longest noticeable effect. Given that soil disturbance/compaction will also become negligible in the second half of a century after disturbance, it is suggested that with adjusted silviculture some of these areas previously available but now reserved could again become viable on a longer disturbance regime, also with less timber removed in any one operation, and as this timber will become additional to what is already available, industry should be more willing to adopt different practices to access this resource. A significantly less intensive silvicultural system is proposed, based on dividing forest blocks in these areas into four compartments of similar size using two intersecting lines on standard bearings, such that five different stages of diversity occur in the one block, which again would be seemingly more preferable.	2e	The Draft and Proposed FMPs include a range of measures that provide for both proactive management through the use of the trafficability index and outcomes-based management in regard to soil compaction and timber harvesting. The soil management system will continue to be refined, through ongoing review of guidance documents. Areas in formal and informal reserves are not available for timber harvesting, although informal reserves and FHZs are reviewed for each forest management plan. However, some informal reserves were recognised as CAR reserves in the 1999 RFA, which committed the State to establish these as such under the current FMP and this plan (see Draft FMP, page 35). This matter will be considered in the revision of the silviculture guidelines during 2013.
374	Silviculture guidelines	Proposed jarrah silviculture guideline, Guiding Principle 2 refers to basal areas (BAs) threshold outlined in Appendix 1. Appendix 1 states thresholds at levels higher than recommended in the Silviculture Review Panel Report. This requires clarity with regard to managing mining and defineinglocal scale management units.	2d	This matter will be considered in the revision of the silviculture guidelines during 2013.
375	Silviculture guidelines	Proposed jarrah silviculture guideline, guiding principle 2, Appendix 1, clarify if limitations applied to culling as well as residue use.	2d	This matter will be considered in the revision of the silviculture guidelines during 2013.
376	Silviculture guidelines	Proposed jarrah silviculture guideline, clarify density guidelines given that what is proposed in Appendix 1 is different for Appendix 3.	2d	This matter will be considered in the revision of the silviculture guidelines during 2013.
377	Silviculture guidelines	Proposed Jarrah silviculture guideline, threshold levels could limit the opportunity for variable density thinning as defined in the guidelines.	2d	This matter will be considered in the revision of the silviculture guidelines during 2013.
378	Silviculture guidelines	Proposed jarrah silviculture guideline, Guiding Principle 3 is not backed-up by evidence.	2d	This matter will be considered in the revision of the silviculture guidelines during 2013.

Comment Number	Theme	Comment	Analysis category	Response
379	Silviculture guidelines	Proposed Jarrah silviculture guideline, Guiding Principle 2, Appendix 1 may negate thinning for water production.	2d	This matter will be considered in the revision of the silviculture guidelines during 2013.
380	Silviculture guidelines	Concerned about the reduction of the rotation length for jarrah from 200 years to 175 years.	2d	The Draft and Proposed FMPs do not propose any change to the nominal jarrah rotation length.
381	Silviculture guidelines	The rotation length of regrowth karri stands regenerated from the 1930s should not increase.	2d	The Draft and Proposed FMPs do not propose any change to the nominal karri rotation length.
382	Silviculture guidelines	Concerned about the reduction of the rotation length for some karri from 100 years to 80 years.	2d	The Draft and Proposed FMPs do not propose any change to the nominal karri rotation length.
383	Silviculture guidelines	Requests increasing the maximum karri coupe size to 50 hectares.	2e	The Draft and Proposed FMPs do not support an increase to the maximum clearfell coupe size. Most coupes are much smaller than maximum size because of other factors.
384	Silviculture guidelines	Concerned that retention of senescent trees signals the introduction of an individual 'old growth tree' assessment process (rather than old growth forest) and will increase the level of interruption to thinning and two tiered forest harvesting operations. The retention of individual senescent trees is inappropriate, dangerous and lacking in silvicultural merit. The Draft FMP does not provide the proposed silvicultural guidelines for retention of senescent trees making it impossible to provide additional comment. Request that the retention of senescent trees proposal be withdrawn and the existing karri silvicultural specifications be retained.	2d	Old-growth forest is defined in the Draft FMP. The retention of senescent trees as outlined in the Draft FMP is supported in the Proposed FMP. Further details will be included in the revised silviculture guidelines.
385	Silviculture guidelines	Page 252 of Draft FMP: proposed changes to the karri silviculture guideline recommends that all trees that were not harvested (within, surrounding and in between coupes) when clear-felled since 1965, should be retained, i.e. they should be retained and excluded from the section "Proposed Changes to the Karri Silviculture Guidelines" and excluded from thinning operations and harvesting.	2e	Noted. This matter will be considered in the revision of the silviculture guidelines during 2013.
386	Silviculture guidelines	The plan does not mention silvicultural objectives, practices or standards for bauxite rehabilitation. The Burrows panel (Burrows et al 2011 silviculture review panel) was not asked to comment on this matter.	2d	Aspects of minesite rehabilitation are covered in the Draft FMP (pages 64-66). This matter will be considered in the revision of the silviculture guidelines during 2013.
387	Silviculture guidelines	Questions the requirement for Temporary Exclusion Areas for 70 Years (Burrows et al 2011, silviculture review panel). Important biological attributes present at 70 years are likely to be present at 30 years and silvicultural treatment requires protecting 'legacies' at specific levels.	2d	The basis for the 70 years is that this is the age at which stands start to show attributes of mature forest. These attributes are not present at 30 years of age.

Comment Number	Theme	Comment	Analysis category	Response
388	Sustained yield	Does not support increase above the levels allowed under the current plan. Sustainable yield of high-quality sawlogs has declined as a result of past logging (e.g. page 14, 2nd paragraph), and is likely to decline further in future due to climate change and other influences (e.g. page 14, 1st paragraph; page 102, 10th paragraph).	2d	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP which include taking into account the effects of climate change. The process for calculating sustained yield was subject to an independent review. Historical declines in sustained yield are due to policy decisions of Government in regard to the area available for timber production.
389	Sustained yield	It is not possible to comment on the sustained yield. The elements of each scenario for sustained yield presented in the plan need to be 'decoupled'. It should be possible to apply elements of each scenario to more fully comment on this aspect of the draft plan.	2e	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. It is a combination of settings that determines sustained yield.
390	Sustained yield	Sustained yield scenario 1 should be amended to a minimum of 65,000m3 with a preference for average annual yield of 70,000m3.	2e	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. It is a combination of settings that determines sustained yield.
391	Sustained yield	Lower yields and restrict cutting to higher rainfall areas.	2e	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. It is a combination of settings that determines sustained yield.
392	Sustained yield	Supports sustainable yield scenario 1. In the light of previous significant reductions in available timber resources, the vulnerability of the native timber industry to further resource reductions and Council's support for a sustainable native timber industry, Council generally supports the sustainable yield (page 106) resources available under scenario 1, however, no comment is offered on the climate change severity as this is beyond the technical expertise of the Shire. A precautionary approach is in the interest of a sustainable native timber industry offering long term resource security.	2e	The potential consequences of climate change are summarised in the Draft FMP (pages 84-86) and an appropriate, broad range of precautionary measures to address climate change is included (in various sections) in the Draft FMP and retained in the Proposed FMP. Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review.
393	Sustained yield	The timber industry cannot survive with decreases in volumes of the size suggested in the various reduction scenarios in the draft FMP, and this next FMP should provide as a minimum the same volume as set under the current FMP, if not an increase, to ensure the ongoing viability of the timber industry.	2e	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review.
394	Sustained yield	Supports lower jarrah sustained yield.	2e	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review.
395	Sustained yield	The FMP 2014-2023 needs to provide for a quality and quantity of wood to provide economic surety for the industry and opportunities for value adding.	2d	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review.

Comment Number	Theme	Comment	Analysis category	Response
396	Sustained yield	It is insulting for the public to learn that future log quotas to SIMCOA and Deanmill have been made ahead of our submissions.	2e	The Draft FMP has not set log quotas; rather it presents a possible range for sustained yield to inform decisions about allowable cut for the final FMP. Log supply contracts are the responsibility of the FPC. If there is insufficient wood resource to provide contracted wood supply to any specific business holding an Investment Security Guarantee (ISG), then relevant compensation clauses in that ISG may be triggered.
397	Sustained yield	Sustained yield and annual harvest plans should be flexible, with regular review.	2d	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review. Within the plan period, annual variations are permitted, but total allowable cut over the period of plan can not be exceeded.
398	Sustained yield	Should constrain the supply of forest products as a step to transitioning to a sustainable use model.	2d	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield will be subject to an independent review. Sustained yield modelling has also determined the allowable cut under the current FMP.
399	Sustained yield	The Draft FMP does not take lower estimates of CO ₂ use by plants into account in its estimates of sustained yield. Estimates of how much CO ₂ land plants can use are too optimistic. Few studies have tested whether soils contain enough nutrients for growth in proportion to rising CO ₂ . The sustained yields from two scenarios are not sustainable. Both are the maximum yield and only one, if either, can be accurate.	2d	Sustained yield calculations use a range of methods and take into account impacts of climate change and were subject to independent review. The calculations have not assumed higher rates of photosynthesis as a result of higher atmospheric carbon dioxide (CO ₂) and so nutrient availability will not increase as a factor limiting plant growth.
400	Sustained yield	Use of non declining yield to qualify sustained yield is too inflexible and should be reviewed (as per recommendation of the Ferguson Panel).	2d	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review.
401	Sustained yield	Independent research bodies such as CSIRO should report on sustained yield negotiations. There will be a need to restructure and government needs to allocate funds.	2d	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review.
402	Sustained yield	Maintaining a viable timber industry should be a stated objective in determining sustained yield.	2d	The plan includes a goal in regard to industry viability and this is considered in establishing allowable cut. A range of factors that impact on industry viability is outside the scope of the plan.
403	Sustained yield	Scenario should not only focus on sustained yield. It should have another goal e.g. sustainable presence of biodiversity.	2d	The Draft and Proposed FMPs include clear goals and KPIs (revised for the Proposed FMP) in relation to biodiversity.
404	Sustained yield	There is a range of scenarios for delivering much greater economic value for the forests which have not been examined.	2d	The sustained yield scenarios in the Draft FMP were based on the settings described in the plan and socio-economic aspects have been considered in developing the Draft and Proposed FMPs.

Comment Number	Theme	Comment	Analysis category	Response
Heritage				
405	Aboriginal culture and heritage	A comprehensive assessment of the plan area for importance to Aboriginal heritage must be completed before the management plan is set in concrete.	2d	The Draft FMP text relating to Noongar culture and heritage has been revised for the Proposed FMP, following input from Noongar representatives and the plan includes a process for ongoing evaluation of these values.
406	Aboriginal culture and heritage	Any native forest logging is likely to be fundamentally inconsistent with the maintenance and protection of the Aboriginal cultural landscape. A comprehensive assessment of landscape-scale cultural values must be undertaken with and by Traditional Owners before any management planning decisions that relate to extractive use of forest products, including logging prescriptions, areas to be logged or log volume allocation.	2d	The Draft FMP text relating to Noongar culture and heritage has been revised for the Proposed FMP, following input from Noongar representatives and the plan includes a process for ongoing evaluation of these values.
407	Aboriginal culture and heritage	It is not clear (in practical terms) how the CALM Act amendments will be formally implemented. The CALM Act amendments should not impose additional layers on the approval process (in context of resource projects/activities).	2b	Guidance documents for implementation of amendments to the CALM Act are under development and will seek to implement the amendments in an effective and efficient manner.
408	Aboriginal culture and heritage	Supports the strategies and strong recognition of heritage, including aspirations of Aboriginal People, and the desire for joint management and undertaking customary activities in the Draft FMP.	2a	The support for strategies relating to Aboriginal culture and heritage is noted.
409	Aboriginal culture and heritage	Considers that the FMP does not address issues of Aboriginal and other Australian heritage.	2d	Heritage issues are addressed in the Draft and Proposed FMPs; including goals, proposed management activities (and reference to guidelines) and KPIs (which have been revised).
410	Aboriginal culture and heritage	The EPA must independently assess the impact continued logging will have on Aboriginal cultural values of south-west forests.	2d	The Draft and Proposed FMPs identify Noongar culture and heritage values and proposes a process for ongoing evaluation of the values. Management activities are included that seek to prevent material adverse effects on Noongar culture and heritage values from disturbance activities.
411	Aboriginal culture and heritage	Noongar culture and heritage should be consistently advanced and referenced throughout the document. A proposed format for referencing Noongar culture and heritage was provided.	1a	The Proposed FMP has been amended to reference Noongar culture and heritage in various places throughout the document, and the relevant section of the heritage chapter has been revised, following input from Noongar representatives.
412	Aboriginal culture and heritage	Refers to page 128 where it is proposed that amendments to the CALM Act will provide for joint management arrangements with Aboriginal communities. Aborigines never logged forests and hopes this fact will be seriously included in the immediate management of forests	2d	The Draft and Proposed FMPs include management activities that seek to prevent material adverse effects on Noongar culture and heritage values from disturbance activities.

Comment Number	Theme	Comment	Analysis category	Response
413	Aboriginal culture and heritage	The wording in the Draft FMP implies that there is no will to enact the joint management provisions of the CALM Act.	2d	The Draft FMP includes various measures to broaden the involvement of Noongar people (see pages 130/131), consistent with the requirements of the 2011 amendments to the CALM Act. These are retained in the Proposed FMP. Negotiation for the SouthWest Native Title settlement is considering areas where joint management might be applied.
414	Aboriginal culture and heritage	Indigenous Joint Management arrangements that facilitate the practice of Aboriginal culture, decision-making and custodianship over land must be put in place over all State forest as an essential element in the protection and maintenance of Aboriginal cultural values of the forest.	2d	The Draft FMP includes various measures to broaden the involvement of Noongar people (see pages 130/131), consistent with the requirements of the 2011 amendments to the CALM Act. These are retained in the Proposed FMP. Negotiation for the SouthWest Native Title settlement is considering areas where joint management might be applied.
415	Aboriginal culture and heritage	The current FMP process should be suspended to allow comprehensive engagement with Southwest Traditional Owners to establish an Indigenous Joint Management Plan to replace the Draft FMP.	2d	The process of developing the Draft FMP has involved engagement with Traditional Owners. The Draft FMP includes various measures to broaden the involvement of Noongar people (see pages 130/131), consistent with the requirements of the 2011 amendments to the CALM Act. These are retained in the Proposed FMP. Negotiation for the SouthWest Native Title settlement is considering areas where joint management might be applied.
416	Aboriginal culture and heritage	The new processes foreshadowed for consultation and involvement of Aboriginal people in joint management and customary uses of forests, as well as processes of archaeological and ethnographic surveys as part of comprehensive identification, assessment and protection of Aboriginal cultural heritage in forests, and to be commended. However, as it stands (without further implementation strategies), the processes cannot be regarded as effectively contributing to Ecologically Sustainable Forest Management in heritage terms.	2d	The Draft FMP includes various measures to broaden the involvement of Noongar people consistent with the requirements of the 2011 amendments to the CALM Act. The Draft FMP identifies Noongar culture and heritage values and proposes a process for ongoing evaluation of these values. These are retained in the Proposed FMP
417	Heritage	The impact of the FMP on the cultural values and cultural landscape of state forest must be comprehensively assessed by the EPA under Part IV of the Environmental Protection Act, as these factors are covered within the definition of 'environment' provided in the Act.	2d	The Draft and Proposed FMPs identify Noongar culture and heritage values and proposes a process for ongoing evaluation of these values. The EPA has the role under the EP Act of assessing the environmental impact of development proposals.
418	Heritage	References the history and way of life in the traditional timber towns, which is lacking in the Draft FMP.	2b	Noted. Timber towns are mentioned in the Draft FMP (page 131). The relevant section of the Proposed FMP Heritage chapter has been revised to reflect the history and contribution of the timber industry.
419	Heritage	Supports current practices to protect indigenous and non-indigenous heritage.	2a	Noted.

Comment Number	Theme	Comment	Analysis category	Response
420	Heritage	Process for protecting cultural values is vague.	2e	The Draft FMP identifies Noongar culture and heritage values and proposes a process for ongoing evaluation of the sevalues. The relevant section of the Proposed FMP heritage chapter has been revised following input from Noongar representatives. The Draft and Proposed FMPs include management activities that seek to prevent material adverse effects on Noongar culture and heritage values from disturbance activities.
421	Heritage	The proponents planned approach for the assessment and protection of cultural values is fundamentally at odds with CALM Act management planning principles, and will not provide for adequate protection of the values.	2d	The Draft FMP identifies Noongar culture and heritage values and proposes a process for ongoing evaluation of the values. The relevant section of the Proposed FMP heritage chapter has been revised following input from Noongar representatives. The Draft and Proposed FMPs include management activities that seek to prevent material adverse effects on Noongar culture and heritage values from disturbance activities.
Socio-economic benefits				
422	Bioprospecting	Add a paragraph under Socio-economic benefits after the Bioprospecting section (page 147) that acknowledges that the Conservation Commission and the Department recognise the issue of Intellectual Property of Traditional Owners and commit to consultation with Traditional Owners on specific cases.	1b	The Proposed FMP includes statement(s) that seek to broaden Noongar consultation, as appropriate. The text of the Proposed FMP makes reference to Noongar intellectual property.
423	Basic Raw Materials (BRM)	Concerned that the location of the larger strategic basic raw material pits could have an impact on haulage costs and future road construction and upgrading. Does not support the proposed changes for BRM to be sourced from fewer larger pits and suggests the determination of any request for material resource be conditional upon an economic viability assessment where the location of those pits is greater than 20km from the proposed works.	2d	The broader issues in relation to management of BRM is discussed in the Draft FMP (page 144). Transitioning to fewer, strategic pits over time (as stated in the Draft FMP, page 144, and retained in the Proposed FMP) is supported.
424	Forest products industry	Encourage the development of employment and regional development benefits arising from establishing new timber processing industries.	2c, 2d	The Draft and Proposed FMPs include a goal to this effect and relevant management activities. There is a range of factors that affect industry viability (including resource security) which are outside the scope of the plan.
425	Forest products industry	Calls on government to develop a Timber Industry Strategy to give a commercial context to the FMP that identifies community needs to strategically plan future sources of forest products.	2c	These issues are beyond the scope of the plan and are the responsibility of the FPC.
426	Forest products industry	Government should engage with industry investors to create an Industry Plan which provides a long term strategy incorporating native forests and which contributes a commercial offset towards the cost of forest management.	2c	These issues are beyond the scope of the plan and are the responsibility of the FPC.

Comment Number	Theme	Comment	Analysis category	Response
427	Forest products industry	Timber communities are perceived negatively owing to misinformation peddled by greens. Dismantling of the industry has detrimental impacts on those that remain.	2e	Noted.
428	Forest products industry	Understanding of (future) forest resource to provide for adaptability in the industry. The FMP 2014-2023 must provide for a greater level of stability and priority for the native forest timber harvesting industry.	2d	The allowable cut for the period 2014-2023 is set in the Proposed FMP. Information about the quality and quantity of available wood resources is made available to industry for future planning.
429	Forest products industry	Government should explore options that provide surety of timber quality and quantity to the industry to encourage investment and long term viability.	2c, 2d	The allowable cut for the period 2014-2023 is set in the Proposed FMP. Information about the quality and quantity of available wood resources is made available to industry for future planning. The 10 year term of the FMP is a statutory limit set through the CALM Act. The term of native forest timber harvest contracts is tied, under the FP Act, to the term of a CALM Act management plan.
430	Forest products industry	Access to forest products needs a different approach to ensure ongoing viability of the Native Forest Timber Harvesting Industry. Proposes a centralised depot where product is categorised.	2c	These issues are beyond the scope of the plan and are the responsibility of the FPC.
431	Forest products industry	The industry should be provided with access to under used wood resources to improve investment with flow-on socio-economic benefits (FPC has identified opportunities for new industries for this resource).	2c	The allowable cut is set in the Proposed FMP, which includes volumes for the full range of log types, including other bole logs. Wood supply contracts are the responsibility of the FPC.
432	Forest products industry	Lack of wood supply resource security, log quality and cost is hindering potential new investment which would create new jobs. Any decrease in available wood resource (or quality) would result in closure of sawmills, harvesting operations and other businesses, and further unemployment, where there is little alternative employment avail (and some say 'fly n fly out' not an option).	2c, 2d	The Draft and Proposed FMPs include the goal and relevant management activities to seek to maintain the long-term viability of the forest products industry and regional socio-economic benefits. There is a range of factors that affect industry viability (including resource security) which are outside the scope of the plan.
433	Forest products industry	Supports well managed sustainable timber industry. The timber harvesting industry provides a sustainable industry that contributes ongoing economic benefit to south-west communities (a balance can be maintained between economics and biodiversity).	2b, 2c	The Draft and Proposed FMPs include the goal and relevant management activities to seek to maintain the long-term viability of the forest products industry and regional socio-economic benefits. There is a range of factors that affect industry viability (including resource security) which are outside the scope of the plan.
434	Forest products industry	The monetary and employment value of minerals mined from forest areas, e.g. Bauxite, is significant and well in excess of that provided by the timber industry on an annual basis. But minerals are non-renewable and once the reserves are depleted. Those industries will cease, whereas forest and timber industries have the potential to continue on a sustainable basis.	2e	Noted.

Comment Number	Theme	Comment	Analysis category	Response
435	Forest products industry	The timber industry is sustainable and supports workers and their families and local businesses. Equal and balanced participation of local communities and non-government organisations is required. Supports the submissions by Forest Industries Federation (WA) and Timber Communities Australia. Supports a vision for the timber industry as "The timber industry based in the Shire of Manjimup is forward thinking, technologically advanced and transitioning in response to change. The Industry is recognised as delivering sustainable and environmentally responsible economic and social value to the community". A considerable number of submissions noting the strong sense of community within the timber towns and industry. Any reduction in log volumes will have a negative effect and would lead to the closure of sawmills at a time when the region has not recovered from the last FMP and restructure. There are limited alternative long term employment opportunities and decisions should take into account these consequences.	2e	The Draft and Proposed FMPs include the goal and relevant management activities to maintain the long-term viability of the forest products industry and regional socio-economic benefits. Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs.
436	Forest products industry	Proposals in the Draft FMP will result in a further contraction of the native forest timber harvesting industry, exacerbating social and economic difficulties in south-west regional communities (e.g. Manjimup, Pemberton). South-west sawmills contribute ~\$60M/year to the economy. Any reduction in timber industry employment may have a detrimental effect on local schools (could lead to closure) and the broader community.	2d	The Draft and Proposed FMPs include the goal and relevant management activities to maintain the long-term viability of the forest products industry and regional socio-economic benefits. Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs.
437	Forest products industry	The timber industry is the only or main employer/main industry in town. Mining industry jobs are not a safe fall-back position if timber industry jobs are lost.	2e	The Draft and Proposed FMPs include the goal and relevant management activities to maintain the long-term viability of the forest products industry and regional socio-economic benefits. Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs.
438	Forest products industry	The economic significance of logging activity has not been truly accounted for in the socio-economic impact assessment.	2d	The Draft and Proposed FMPs include the goal and relevant management activities to maintain the long-term viability of the forest products industry and regional socio-economic benefits. Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs. The socio-economic study identified the economic significance of the timber harvest and wood processing industry, by accessing relevant information and consultation with industry.

Comment Number	Theme	Comment	Analysis category	Response
439	Forest products industry	Suggests that the importance of socio economic benefits of forest industries is understated in the Draft FMP. The reduction in sustainable yield due to additional reservation under the current FMP, RFA, and as a result of the <i>Protecting our old-growth forests</i> policy has inflicted serious hardship upon the communities of Manjimup and to a lesser extent, Pemberton and Nannup. The current management plan does not adequately monitor the socio-economic impacts of these changes.	2d	The Draft and Proposed FMPs include the goal and relevant management activities to maintain the long-term viability of the forest products industry and regional socio-economic benefits. Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs. The socio-economic study identified the social and economic significance of the timber harvest and wood processing industry, by accessing relevant information and consultation with industry. A KPI relating to the socio-economic benefits of the industry is included in the Proposed FMP in the socio-economic benefits chapter.
440	Forest products industry	Significant investment has been made to meet challenges from the <i>Protecting our old-growth forests</i> policy. A further reduction in the level of timber products from native forests will jeopardise the efficiency of operations, increase haulage costs and potentially lead to job losses.	2d	Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs.
441	Forest products industry	Supports Timber Communities Australia and Forest Industries Federation (WA) submissions.	2e	Noted.
442	Forest products industry	Western Australia's forest products industry is socially and economically sub optimal.	2e	Noted.
443	Harvesting native forest	Considers that logging of native forests played an important role in the Australian economy in the past but questions the benefits that it currently provides as opposed to the greater benefit if logging does not take place. The current FMP failed to achieve standards expected by the general public.	2e	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM. Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs. The socio-economic study identified the social and economic significance of the timber harvest and wood processing industry, by accessing relevant information and consultation with industry.
444	Harvesting native forest	Alleged socio-economic benefits of native forest logging are exceeded by its costs and should be stopped.	2e	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM. Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs. The socio-economic study identified the social and economic significance of the timber harvest and wood processing industry, by accessing relevant information and consultation with industry.

Comment Number	Theme	Comment	Analysis category	Response
445	Harvesting native forest	The logging industry is not economically viable and is subsidised by government. Independent investigation called for. Concerns about the loss (\$13 million in 2010/11) being made by the FPC have led to a review currently being conducted by the Auditor General into the economic viability of the timber industry. Survival of our native forests should not be compromised to 'prop up' an industry that is not even economically sustainable. Should not be sacrificing even a small proportion of our native forests in what may be a lost cause. If forest logging ceased, there would be funds to maintain and rehabilitate the forests and protect native flora and fauna more effectively.	2e	The CALM Act provides for a management plan for State forest and timber reserves to have a purpose of native forest timber production on a sustained yield basis. Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM and the Draft and Proposed FMPs provide for a native forest products industry. Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs. The socio-economic study identified the social and economic significance of the timber harvest and wood processing industry, by accessing relevant information and consultation with industry.
446	Harvesting native forest	Recreational buffers/corridors - suggests forest users only need to be kept far enough from operations to maintain their safety, and upon successful completion of operations there should be no further reason to exclude them from the reality of a dynamic working forest. Their contact with disturbance would only be short lived, and it would afford them the opportunity to witness first-hand the ability of a properly managed forest to regenerate. How can individuals advocate conserving more of our forests, which are managed to developed world standards, at the expense of logging forests from developing nations with regulatory shortcomings?	2d	Other than the management options presented in the Draft FMP, there are no proposed changes to informal reserves. The Proposed FMP includes a travel route (informal reserve) for parts of the Munda Biddi Trail, and some changes to travel routes in the Warren region.
447	Harvesting native forest	There should be an independent inquiry to determine if current logging practices are sustainable and profitable.	2d, 2c	The Draft FMP has been developed based on scientific knowledge and socio-economic information, and in line with the principles of ESFM as detailed in the CALM Act, and seeks to achieve an appropriate balance between various values and uses. Silvicultural practices were reviewed by an expert panel (Burrows et al, 2011). Their findings were incorporated into the Draft FMP and will inform revision of silviculture guidelines during 2013. The process for calculating sustained yield has been subject to an independent review in early 2013, and sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The profitability of the industry is beyond the scope of the plan.
448	Harvesting native forest	Cost effective access to forest and proximity of the resource to milling infrastructure are matters that need to be addressed.	2d	The Draft FMP includes activities relating to access infrastructure (see pages 142/3). The harvest planning process (e.g., see pages 112/3) identifies the areas for timber harvesting and takes into consideration the proximity of wood resources to milling infrastructure.

Comment Number	Theme	Comment	Analysis category	Response
449	Mining	Opposed to expansion of bauxite mining. Conservation Commission should object to new applications in the Mining Wardens Court.	2c	Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans.
450	Mining	As a significant infrastructure development, the Dampier Bunbury Natural Gas Pipeline needs to be planned for in the proposed plan, linked to gas resource at Whicher and fire control strategies.	2d	The Draft FMP notes the potential for infrastructure development of this type (see page 41).
451	Mining	<p>Page 48 of the Draaft FMP, clauses 8.3 and 8.4 indicate that the Conservation Commission and DEC will seek to recover costs for supplying:</p> <ul style="list-style-type: none"> • advice regarding the impacts of mining and petroleum operations, mitigation measures and rehabilitation; • costs incurred as a result of proponent action; and • 'post hand back' costs. <p>The Draft FMP should be amended to ensure industry will not be required to cover costs or put forward bonds above and beyond the significant funding and other contributions made through mining securities and mitigation and offset requirements.</p>	2d	Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans. The Draft FMP includes some related management activities for the Department to <i>explore</i> mechanisms for recovery of industry-related costs it incurs (see page 48) and to <i>explore</i> mechanisms for refundable environmental performance bonds (see page 65). These are retained in the Proposed FMP, as is reference to the State Environmental Offsets Policy.
452	Mining	Welcomes the recognition of mining as a significant activity in the forest.	2d	Noted.
453	Mining	Industry must be consulted before any changes to reservation that may impact on mining tenements, exploration licences and relevant applications.	2d	Commitment is given in the Draft FMP to consult with the relevant agency and Minister regarding proposed tenure changes (see Draft FMP page 32). The Proposed FMP includes additional statements to this effect.
454	Mining	The framework under which exploration and mining operates (other than State Agreement Acts) is well established and should not be duplicated in the plan.	2d	Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans; the Draft FMP does not attempt to duplicate this.

Comment Number	Theme	Comment	Analysis category	Response
455	Recreation and tourism	Attention to socio-economic issues is inadequate, in particular recreation and tourism are big contributors to the region's income. Need to ensure facts and figures are up to date and appropriate attention given. Also: i) document does not sufficiently reflect the principles of sustainability; ii) context of directions should reflect the needs of the state's future population in terms of environmental education, research, recreation and tourism; iii) where harvesting occurs in State forests/timber reserves, necessary guidelines should be in place to ensure that the impacts on residential and recreational land uses are minimised including limiting the visual impact of tree removal as a result of harvesting. The economic contribution and visitor information numbers need to be updated to reflect more recent research. Department of Water Draft Policy 13 advocates maintaining current levels of recreation and not recognising potential population growth and the need for increased tourism opportunities in State forest areas. Too much emphasis on conservation has a detrimental impact on the social and economic well-being of rural communities. There is no acknowledgement of the recreational values of forests which supports eco-tourism.	2d	The Draft and Proposed FMPs acknowledge these values and includes management activities that seek to address these issues; these complement existing DEC policies and strategies which are revised as circumstances require. The socio-economic impact study also discusses tourism and recreation.
456	Recreation and tourism	Forests are important places for people to relax, recreate and 'get back to nature', which is essential for the physical and mental health of humans. The rapidly increasing population of Western Australia will require many more natural areas in the future and current national parks, State forests and nature reserves are already under increasing pressure from increased visitation and from conflicting uses (e.g. nature-based vs. adventure users). In the future more areas will be required to separate those after a 'wilderness' experience from 4WDers, trail bike riders, mountain bike riders and other conflicting recreational tourists.	2d	The Draft and Proposed FMPs acknowledge these values and includes management activities that seek to address these issues; these complement existing DEC policies and strategies which are revised as circumstances require. The socio-economic impact study also discusses tourism and recreation.
457	Recreation and tourism	There is an urgent need for more family camping sites in forest areas close to the metropolitan area, which is restricted by constraints outlined in Policy 13 relating to recreation on public drinking water sources areas. Recommends closer liaison with water managers to enable camping in catchment areas.	2d	Recreation on water catchment areas is governed by Government policy and agency documentation. The Draft and Proposed FMPs acknowledge these values and include management activities that seek to address these issues; these complement existing DEC policies and strategies which are revised as circumstances require. Government policy provides for an increase in the development of recreational camping sites.
458	Harvesting native forest	Continued timber harvesting will impact on local tourism opportunities in the Jarrahdale area. Greater benefit would come from ceasing Native Forest Timber Harvesting to encourage other industries, e.g. tourism, viticulture.	2e	Noted. A socio-economic assessment was conducted and released with the Draft FMP.

Comment Number	Theme	Comment	Analysis category	Response
459	Socio-economic	Conduct a comprehensive analysis of social, economic and environmental values of the forest before the Draft FMP is finalised.	2d	Noted. A socio-economic assessment was conducted—and released with the Draft FMP.
460	Socio-economic	The Draft FMP fails to provide any comprehensive and informative details of the costs and benefits of native forest logging that relate to neither industry viability nor the critical wider timber industry context which encapsulates and influences it. The same deficiency occurs in the restricted socio-economic assessment study associated with the Draft FMP. Appropriate information and greater transparency on this aspect of productive capacity could be expected to assist public understanding of Ecologically Sustainable Forest Management.	2e	Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs. The socio-economic study focused on the economic and social significance of the timber harvesting and wood processing industry, by accessing relevant information and in consultation with industry.
461	Socio-economic	Triple bottom line accounting means that social, economic and environmental considerations need to be given appropriate weighting, and the impacts the next FMP are going to have on the community should be very carefully considered. The current FMP was written (and related decisions made) with little real or no concern for socio-economic impacts.	2d	Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs. The socio-economic study focussed on the economic and social significance of the timber harvest and wood processing industry, by accessing relevant information and consultation with industry.
462	Bioprospecting	Bioprospecting section of the Draft FMP does not provide enough detail. For example, who would be undertaking such ‘prospecting’ and under what conditions? There must be controls in place to ensure that ownership does not leave Australia, that threatened species are not put at risk and that indigenous people with knowledge of bush food and medicine are not bypassed in the process.	2c, 2d	Bioprospecting contracts will include measures to protect the State's interests and environmental values. The Proposed FMP acknowledges Noongar knowledge in this area. The development of contracts is outside the scope of the plan.
463	Bioprospecting	The Draft FMP does not make a link between a healthy ecosystem and the state of human health and wellbeing, e.g. a portion of the drugs used in medicine are sourced from nature. Currently it is unknown what other medications can be sourced.	2d	Noted. The Draft and Proposed FMPs provide support for bioprospecting.
464	Socio-economic	Jobs were lost and rural communities damaged 10 years ago and many small businesses have not recovered.	2d	Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs. The socio-economic study identified the social and economic significance of the timber harvest and wood processing industry, by accessing relevant information and in consultation with industry.
465	Socio-economic	Current FMP is a dismal failure in context of social impacts.	2e	Social, economic and environmental issues have been considered in the process of developing the Draft and Proposed FMPs. The socio-economic study identified the social and economic significance of the timber harvest and wood processing industry, by accessing relevant information and in consultation with industry.

Comment Number	Theme	Comment	Analysis category	Response
466	Socio-economic	On page 138, add a section about opportunities to increase Noongar employment in jobs related to forest management and protection.	2d	This intent has been incorporated in the Proposed FMP, with a statement(s) that seeks to broaden Noongar consultation and facilitate economic opportunities.
467	Socio-economic	The focus of the plan should be on transitioning affected communities to 'non-exploitative' industries.	2f	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ESFM. Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans.
468	Socio-economic	The Draft FMP has failed the intent of Ecologically Sustainable Forest Management by failing to assess all economic forest product utilisation options.	2c	End-use of harvested logs is beyond the scope of the plan. FPC is seeking new markets independently of this plan but in accordance with the principles of ESFM as per the FP Act.
469	Wildflower industry	The interests of the wildflower picking industry were not heeded last time.	2d	Wildflower picking is still catered for in certain areas. The phasing out of wildflower picking in some areas has been implemented through previous and other management plans.
Plan implementation and management				
470	Harvesting native forest	The Draft FMP has a focus of regulating timber production activity (ignoring potential impacts of other uses) and ignores the opportunity for forest managers to use commercial harvesting as a management tool to allow effective forest management in a cost-effective manner for the state.	2d	The Draft FMP recognises the potential impacts of a range of activities. Timber harvesting provides revenue to the state which helps offset the costs of forest management and can assist in achieving silvicultural and other forest management objectives.
471	Harvesting native forest	Illegal logging has run rampant for many decades.	2e	There are existing processes to approve and monitor harvesting operations. The Proposed FMP proposes improvements to the inter-agency arrangement between DEC and the FPC to address concerns expressed in the mid- and end-of-term audits of the current FMP.
472	Harvesting native forest	The Draft FMP refers to the importance of knowledge and adaptive management but relies on a 'precautionary' approach for recommending regulation rather than (and despite) the available scientific evidence.	2d	The importance of knowledge and adaptive management is acknowledged in the plan, which is consistent with the precautionary principle as defined in the CALM Act. It is considered appropriate that the Draft and Proposed FMPs propose improvements to the inter-agency arrangements between DEC and the FPC to address concerns expressed in the mid- and end-of-term audits of the current FMP.
473	Harvesting native forest	The sorting of log grades and the waste and misuse of logs remain unaddressed by the Draft FMP.	2d	There are existing processes to approve and monitor harvesting operations. The Draft FMP includes management activity 57 (retained in the Proposed FMP) to monitor grading and removals of native forest logs.
474	Harvesting native forest	Questions the level of control placed on the native forest timber industry when a significant area of 'better class' of forest is stripped for mining (bauxite).	2c	Mining and rehabilitation following mining is largely regulated by legislation and mechanisms other than the CALM Act and its associated management plans. Mining proposals are subject to environmental impact assessment in accordance with the EP Act.

Comment Number	Theme	Comment	Analysis category	Response
475	Harvesting native forest	Based on past performance, there are concerns about the ability of the Commission to enforce compliance, which needs to be given more power. Up to two thirds of KPIs have not been met. DEC lacks the powers to enforce compliance with the FMP, which is inadequate as a regulatory instrument. It is not acceptable that forest logging operations are exempt from legislation to protect our threatened species and that there are no effective regulatory sanctions for non-compliance with the FMP. Conservation and environmental requirements must be legally binding and the Conservation Commission must be given the power to enforce them. A suitable framework is not in place to manage forests (legislation, measuring goals and accountability, application of scientific research). The FMP should include enforceable management measures and clear KPIs that, if not met, are subject to suspension of disturbance activities in the FMP area.	2d	Section 19 of the CALM Act outlines the functions of the Conservation Commission, including setting performance criteria for and assessing and auditing compliance with the forest management plan. Draft FMP Management activities numbers 112-114 (retained in the Proposed FMP) discuss the Commission, Department and FPC conducting an annual audit program, which considers the potential risks to achievement of the plan. These will be published. The Proposed FMP includes a range of KPIs designed to monitor the effectiveness of implementing the management activities of the plan. The Proposed FMP also proposes changes to inter-agency arrangements between DEC and the FPC that will seek to enhance compliance with plan requirements.
476	Heritage	Concern at the decrease in resource allocation to a State asset that should be managed for future generations. Review of ongoing resources is required.	2c	The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. However, resourcing is beyond the scope of the management plan.
477	Implementation	The FMP should include enforceable management measures, and clear KPIs that if not met, are subject to suspension of disturbance activities in the FMP area.	2d	The Draft FMP proposes changes to inter-agency arrangements that will seek to enhance compliance with plan requirements. The Proposed FMP includes a range of revised KPIs that more comprehensively cover matters addressed in the plan.
478	Implementation	Notes the impact of plantations on streamflow is addressed in the guidelines, but seeks direction on how it will be implemented, enforced and audited for compliance	2d	The Draft and Proposed FMPs include a management activity which requires a catchment management plan where plantation management may result in a reduction in streamflow.
479	Implementation	There is no effective compliance and enforcement regime within the plan and it should be rejected by the EPA. If not, there should be Ministerial conditions attached to enforce compliance.	2d	The Draft FMP proposes changes to inter-agency arrangements that seek to enhance compliance with plan requirements.
480	Implementation	It is unbelievable (or not) that yet another FMP is being prepared when fundamental problems with the content and implementation of the current FMP have not been addressed, e.g. widespread breaches, unenforced/unenforceable conditions, lack of scientific knowledge of logging impacts on endangered species, etc.	2d	The Draft and Proposed FMPs propose changes to inter-agency arrangements that seek to enhance compliance with plan requirements, and include a management activity for FORESTCHECK to be continued and extended. DEC recovery plans cover a range of matters, including research programs, for specific threatened species.
481	Implementation	Until DEC has an EMS, it is difficult for it to gain the faith of the public.	2d	In addition to responsibilities set by legislative requirements, there is a hierarchy of elements (set out in the 'Plan implementation and management' chapter) that together, combine to serve the purpose and intent of a system for environmental management for the Department.

Comment Number	Theme	Comment	Analysis category	Response
482	Implementation	Concerned that neither DEC nor the Conservation Commission has achieved environmental certification.	2d	In addition to responsibilities set by legislative requirements, there is a hierarchy of elements (set out in the 'Plan implementation and management' chapter) that together, combine to serve the purpose and intent of a system for environmental management for the Department.
483	Implementation	Suggests that since implementation of the next FMP is left to the discretion of DEC, actions related to logging are implemented on time but those relating to the protection of biodiversity are delayed or not implemented at all.	2e	The management activities proposed in the plan will be implemented during the term of the plan, depending on available resources.
484	Implementation	There should be greater opportunities for Noongar people to be involved in the assessment of the implementation of the FMP. On page 155, include "audits may involve Noongar Peoples in order to determine the effectiveness of the recognition and protection of Aboriginal culture and heritage and the extent of consultation with Noongar Peoples."	1c	The Proposed FMP includes statement(s) that seek to broaden Noongar consultation, as appropriate.
485	Implementation	Measures noted in the FMP should be adequately funded and resourced in order to be effectively managed by DEC.	2c	The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. However, funding and resourcing is beyond the scope of the plan.
486	Implementation	The plan relies on the Good Neighbour Policy as the primary tool to manage matters such as weeds, fire etc. with neighbours to DEC-managed lands (primarily farmland). To date, implementing this policy has been under funded and transferring the policy to 'on the ground' action has not been effective. Implementation of the plan needs to be adequately funded and resourced.	2c	The Draft and Proposed FMPs include a range of measures to address weeds and fire and DEC has regard to its Good Neighbour Policy in conducting its operations. The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. However, resourcing is beyond the scope of the plan.
487	Implementation	The separation of DEC and FPC is serving no benefit and is inefficient. Independent verification of proper practice would be better achieved through a third party audit of practices to a suitable forest management standard and the FMP.	2d	The Conservation Commission, and auditors of FPC's Environmental Management System/Australian Forestry Standard, conducts third party performance reviews and audits.
488	Implementation	There should be clearer outline of roles, responsibilities and resources. Needs emphasis on reference to resource limitation across responsible agencies.	2d, 2c	The Draft FMP proposes changes to inter-agency arrangements that will seek to enhance compliance with plan requirements. The plan sets the framework for resource allocation and allows for priorities to be addressed during the life of the plan. However, resourcing is beyond the scope of the plan.
489	Implementation	DEC and FPC can't be trusted to manage our forests.	2e	The Conservation Commission, under the CALM Act, undertakes an independent audit role. The CALM and FP Acts give these agencies defined responsibilities for forest management (DEC) and harvest of forest products (FPC).

Comment Number	Theme	Comment	Analysis category	Response
490	Implementation	Concerned about the lack of monitoring of DEC's and the FPC's compliance with the Ministerial conditions on the FMP, which should be carried out by the compliance and monitoring section of DEC but isn't, and also that having both implementation and monitoring within DEC is a serious conflict of interests.	2d	The Draft FMP proposes changes to inter-agency arrangements that will seek to enhance compliance with plan requirements. The Conservation Commission, and auditors of FPC's Environmental Management System/Australian Forestry Standard, conducts third party performance reviews and audits. DEC approves and monitors operations undertaken by the FPC. DEC also undertakes internal audits, which are carried out by Management Audit Branch, responsible to DEC's Director General.
491	Monitoring and adaptive management	Point 13 (Page 49). Adaptive management is mentioned frequently and a definition is provided in the glossary. However, there appears to be no real consideration or discussion given to 'what' adaptive management actions might be implemented. Fire and thinning are the two major 'tools' available to us. I believe a short paragraph clearly indicating the types of adaptive management tools available to the Department would be beneficial to the wider audience.	2d	Noted. The Draft and Proposed FMPs address adaptive management (for example, in the 'Plan implementation and management' chapter), and include provision for 'silviculture for ecosystem health' and for 'water production'.
492	Monitoring and adaptive management	The FMP should provide clear guidance on the establishment and maintenance of long term experimentation in the forest, with an indication of responsibility. Consideration should be given to the establishment of a WA Forest Management Research Institute.	2e	Noted. DEC maintains a research function and seeks to target scientific research to issues of high priority, especially biodiversity conservation (refer to the Strategic Plan for Biodiversity Conservation Research 2008-2017). The plan proposes a number of management activities to build knowledge on the area covered by the plan (see Draft FMP activity 115, retained in the Proposed FMP). DEC maintains partnerships with other entities, including tertiary institutions, where this supports DEC's programs.
493	Monitoring and adaptive management	FMP should present an advanced monitoring strategy and a plan for adaptive management that involves a broad range of stakeholders.	2d	The Draft and Proposed FMPs include measures for monitoring, adaptive management and stakeholder engagement.
494	Monitoring and adaptive management	This history of adaptive management by forest scientists also coincides with a long history of timber production. It is a concern that the Draft FMP fails to acknowledge this history, that we have a structural diversity of forests worthy of reservation 'despite' a long history of timber production.	2e	Noted.
495	Monitoring and adaptive management	The establishment of an independently accredited and audited adaptive management system is a critical element in ensuring that forest management activities do not have an unacceptable impact on social, ecological and cultural values of the forests.	2d	The Conservation Commission, and auditors of FPC's Environmental Management System/Australian Forestry Standard, conducts third party performance reviews and audits. DEC approves and monitors operations undertaken by the FPC. DEC also undertakes internal audits, which are carried out by Management Audit Branch, responsible to the DEC's Director General.

Comment Number	Theme	Comment	Analysis category	Response
496	Stakeholder involvement	In the existing FMP 2004-13 there were distinct mentions of plans to provide information and education to the public on ecologically sustainable forest management (e.g. Action 35- 'Community involvement'). The continuing need to educate and inform the community on ecologically sustainable forest management is as great as ever. During the FMP 2004-13 there was limited action by DEC on community education about forests. Facilities such as the Wellington Discovery Forest are attempting to improve the situation but are limited by the necessity to obtain grant funds, donations etc. for a task that really needs a commitment by DEC to be able to succeed. On behalf of the Friends of the Wellington Discovery Forest we would like to see the goal of improving the level of community information and awareness of forests and their management given a higher level of prominence in the FMP and a commitment by DEC towards making significant progress in achieving this goal.	2d	Noted. The Draft and Proposed FMPs include overarching measures for stakeholder engagement that support a range of other DEC community programs, including community education on ESM.
497	Stakeholder involvement	Advocates the future development of the 'Foresters Wood' site be consistent with the objective of recognising the contribution to civilisation by famous trees of commerce, culture, legend and literature. It would be appropriate for the 'Forester's Wood' to promote education in forestry and silviculture.	2d	Noted. The Draft and Proposed FMPs include overarching measures for stakeholder engagement that support a range of other DEC community programs, including community education on ESM.
Key performance indicators				
498	KPI	The performance target of the KPI measuring impact on biodiversity, should measure positive effect not just avoidance of a negative effect.	2e	KPIs for biodiversity have been revised for the Proposed FMP.
499	KPI	KPI 4 is not in the form of a KPI.	2d	Noted. A general review of KPIs has been undertaken for the Proposed FMP.
500	KPI	KPI 8 - Presence of Sirex - recommends to remove reference to 'trap trees' and replace 'static traps' with 'panel traps'.	2d	Noted. A general review of KPIs has been undertaken for the Proposed FMP. The presence of Sirex is no longer included as a specific/separate KPI.
501	KPI	KPI 27 is too generalised to be meaningful.	1e	Noted. A general review of KPIs has been undertaken for the Proposed FMP. This KPI has been modified to be more specific.
502	KPI	KPIs 11, 12 and 13 do not address the proposed change to the draft plan (removed phased thinning) that has the potential to affect ground water quality and surface water quality in catchments that are not fully forested in the eastern parts of the draft plan area (direct impact on agriculture and water supply quality in the Wellington Dam catchment).	2d	A water related KPI is included in the Proposed FMP which includes the monitoring of groundwater levels on lands vested in the Conservation Commission. Timber harvesting within areas covered by the plan is not considered to significantly impact on water quality on nearby cleared private land, where poor water quality is more of a consequence of clearing for agriculture and agriculture practices.

Comment Number	Theme	Comment	Analysis category	Response
503	KPI	In relation to pages 160-161 of the Draft FMP covering Public Education and Awareness (KPI 27), there is a critical need to improve the level of community understanding and information about forests and ecologically sustainable forest management under the control of DEC. One of the best ways of doing this is through projects using the Wellington Discovery Forest, which is ready made for demonstrating to the public what ecologically sustainable forest management is all about. All that is needed for it to achieve its world class potential is the injection of funds and greater involvement by DEC. It is therefore recommended that the following performance target should be added to 'KPI 27' (see page 161 of the Draft FMP): "A significant increase in the projects and funding associated with the Wellington Discovery Forest".	2d	The Wellington Discovery Forest is one of a number of public involvement and education sites/activities. It is not considered appropriate to single this area out as a target in the KPI, however, the plan includes community education on ESFM.
504	KPI	Recommends an addition to KPI 22 to maintain the existing allowable cut for sawmills.	2d	A general review of KPIs has been undertaken for the Proposed FMP. Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield has been subject to an independent review.
505	KPI	KPIs should be reported annually.	2d	While this proposal is too resource intensive to implement, there is a range of factors that will be monitored ,and results will be reported in the mid- and end-of-term reviews.
506	KPI	New KPIs recommended. Include increase in species, forested area, healthy forest and soil and water quality.	2d	A general review of KPIs has been undertaken for the Proposed FMP. Various KPIs address biodiversity, forest area, soils and water quality and the targets within these are considered appropriate.
507	KPI	KPIs should be developed for all stressors that impact on forests (weeds, diseases etc.).	2d	It is considered that the current range of revised KPIs addresses significant stressors.
508	KPI	Should be additional and more specific KPIs.	1d	A general review of KPIs has been undertaken for the Proposed FMP.
509	KPI	Existing KPIs are supported, but these require vigorous enforcement and monitoring.	2a	Noted - revised KPIs are included in the Proposed FMP. Management activities numbers 112-114 in the Draft FMP (retained in the Proposed FMP), discuss the Commission, Department and FPC's annual audit program, which considers the potential risks to achievement of the plan. These audits will be published.
510	KPI	The removal of all KPIs from non-indigenous cultural heritage identification assessment and protection processes seriously downgraded the significance of such heritage in forest management. This places a high level of risk to the conservation of non-indigenous cultural heritage in state Forests which are subject to intensive logging.	2d	The suite of KPIs seeks to focus on the most significant issues and areas where it is practicable to monitor and report on the effectiveness of management. Management of non-indigenous cultural heritage is a requirement of legislation (and also the plan).

Comment Number	Theme	Comment	Analysis category	Response
511	KPI	KPI 22 should include a performance target, as a goal of the plan is to maintain long term viability of a forest products industry and regional social and economic benefit. Set a qualitative target to provide confidence to the industry to move forward.	2d	A general review of KPIs has been undertaken for the Proposed FMP. Many factors influencing industry viability are beyond the scope of the plan and for some KPIs such as this, it is considered more appropriate to monitor trends than set targets.
512	KPI	Requests a new goal or KPI that provides for the preferential sale of native hardwood timber to companies with product certification.	2c	This request is beyond the scope of the plan.
513	KPI	There is no clear goal or KPI for protection of marri.	2d	Additional measures will be included in revised silviculture guidelines (page 42 in the Draft FMP and retained in the Proposed FMP) for protecting marris as a source of food and habitat for cockatoos.
514	KPI	Recommends that KPI 16 on page 124 of the plan be amended to allow the cumulative annual removals to exceed the equivalent inferred cumulative average annual allowable cut by up to 10 per cent in the first six years of the plan and five per cent in year nine. This will allow for adjustment to meet market demand, encourage new investment in the early stages of the FMP period and reduce the burden on business through storing processed timber in times of depressed market demand.	2d	The targets for this KPI are considered to adequately provide for variation in market demand and investment in processing capacity.
515	KPI	Recommends the inclusion of a KPI to measure FPC success in developing new markets to support production opportunities to support a sustainable industry.	2c	End-use of harvested logs is beyond the scope of the plan. A revised KPI for the Proposed FMP includes a performance measure related to investment in processing capacity.
516	KPI	KPIs: conformance with a negative exponential distribution at a landscape/whole of forest level will do no more than demonstrate a failure to prevent large wildfires. The FMP should propose an average annual target area of 300,000 ha and an additional KPI be included with a performance measure being the percentage of the annual target area burnt and with a performance target of 90%.	2e	Noted. Periodic review of the basis and methodology for bushfire risk treatment, including prescribed burning, is undertaken consistent with risk management principles. Resourcing is beyond the scope of the plan
517	KPI	The prescribed burning program should be increased from 200,000 to 250,000 or 300,000 ha per annum until the backlog of heavy fuels is removed. Fire management is fundamental to the management of the forest ecosystems and should underpin the FMP. Include a KPI that at least 300,000 ha be burnt annually. Such burning shall be undertaken according to the priorities identified in the 'Rating System for Prescribed Burns' or a similar rating system, to ensure the best outcomes are achieved.	2e	Noted. Periodic review of the basis and methodology for bushfire risk treatment, including prescribed burning, is undertaken consistent with risk management principles. Resourcing is beyond the scope of the plan.
518	KPI	Recommends the following be added to KPI 12 "The number of sites with an increase in stream flow as a result of management activities."	1d	The KPI target in the Draft FMP has been amended in the Proposed FMP to include the number of sites with no decrease in streamflow as a result of management activities.

Comment Number	Theme	Comment	Analysis category	Response
519	KPI	The KPIs are virtually meaningless in the absence of an adaptive management regime and as a basis for adaptive management decisions. An audit of forest ecosystem health and values is necessary to establish a baseline for assessment and implementation of management regimes.	2d	The Proposed FMP promotes adaptive management and references the Department's approach to adaptive management. Historical records, past and ongoing monitoring by the Department, other agencies and research institutions, provide baseline information for evaluating trends.

Appendix 2a: Summary of comments on proposed key changes

Proposed change	Support for	Opposed to	Additional input	Outcome
Proposed additions to Whicher National Park	15 submissions supported reserve additions, 4 of these voiced support with qualifications	11	12 submissions clearly stated that it was not necessary to add to the reserve system, but Whicher National Park was not specifically referenced	The proposed additions to the existing national park would increase the area of existing and proposed formal reserves by 4,010 hectares, including 2,370 hectares of the Whicher Scarp ecosystem, as per the Draft FMP.
Improvements to silviculture guidelines	6	9 Eight of which opposed the addition to habitat element to retain dead standing trees.	3,035 submissions referenced protecting marri.	As required by the previous FMP, an expert panel has completed a review of silvicultural practices (in 2011), and based on their recommendations, modifications to silviculture guidelines have been made to enhance biodiversity and other outcomes. Changes include added protection of marri trees, which are key habitat for black cockatoos. Habitat requirements (such as nesting, roosting and foraging needs) are considered in selecting habitat trees and hollow logs for retention.
Revising travel routes in DEC's Warren Region	3	1		Travel route locations have been modified in the Warren Region, as outlined in the Draft FMP.
Publishing annually a map of the extent of old-growth forest	1			The Department will publish a map on its website each year, depicting the status and extent of the old-growth forest at the end of the previous year, which identifies and explains any variations that have occurred during the previous year, as per the Draft FMP.
Review planning processes for all disturbance on all land tenure to ensure a consistent approach for checking for old-growth forest	No comments received.	No comments received.		Planning processes are to be revised to seek to ensure a consistent approach to all disturbance operations on all land categories, as per the Draft FMP.
Areas previously classified as old-growth forest but are confirmed not to be old-growth forest will no longer be recognised as informal reserves	9	2		When areas mapped as old-growth forest are found not to be old-growth forest or any other type of informal reserve, they will no longer be recognised as an informal reserve, as per the Draft FMP.

Proposed change	Support for	Opposed to	Additional input	Outcome
Removing phased harvesting requirements (reduced salinity risk area)	No comments received.	No comments received.	Three submissions want no change until expert comment provided, in particular more analysis of the water quality issue is required.	The phased harvesting requirement will be removed in the Department's Swan and South West regions and part of the Warren Region. The phased harvesting requirement for other parts of the Warren Region will be retained. The planning process for timber harvesting is to be revised so that in partially cleared catchments categorised by the Department of Agriculture and Food WA as having a high salinity risk, there is a requirement to address the potential for adverse effects on salinity of streams
Strategic access to BRM from fewer pits		Four submissions citing increased costs.		In this plan it is intended that basic raw materials be sourced from a network of (fewer) strategic pits, which will be identified in consultation with relevant government agencies and basic raw material users, as per the Draft FMP.
Formalising inter-agency arrangements between DEC and the FPC	No comments received.	No comments received.	While no specific comments were received relating to this process there was a range of comments received on the Conservation Commission's perceived lack of ability to enforce compliance with the requirements of the plan.	It is intended that the interagency arrangements between the Department and the FPC be formalised in writing to clarify and improve the current arrangements, as per the Draft FMP.

Appendix 2b: Summary of comments on proposed management options

Proposed change	Management Option	Support for	Opposed to	Additional input	Outcome
Process for public nomination of previously unmapped old-growth forest	<i>Option 1</i> No change	6		10 submissions also proposed a 'reverse process', that is, public nominations of areas mapped as old-growth forest but is believed not to be old-growth forest.	In this plan, the public nomination process for old-growth forest will be continued, but it is intended that the administration will be transferred to the Department (as per management option 2 of the Draft FMP)
	<i>Option 2</i> Process to be administered by DEC	7			
	<i>Option 3</i> Discontinue public nomination process	6			
Informal reserves for the Munda Biddi Trail	<i>Option 1</i> No change	10			Travel route buffers will now apply to parts of the Munda Biddi Trail (as per management option 2 of the Draft FMP)
	<i>Option 2</i> Apply travel routes to certain parts	18	1	Three submissions proposed wider buffer areas	

Proposed change	Management Option	Support for	Opposed to	Additional input	Outcome
Settings for FHZs	<i>Option 1</i> No change	17	24	Includes two submissions which supported retaining the total area but with changes to the size of the FHZ The 24 submissions were opposed to any FHZs.	The FHZ network has been refined for this plan, resulting in a reweighting of the allocation of area to those forest ecosystems with lower levels of reservation, a slightly greater area of mature forest in FHZs and a higher proportion of mature forest in FHZs, a lesser area of regrowth forest and a lesser total area in FHZs, a greater range of size of FHZs in recognition of the characteristics of the landscape in which they are located, and the inclusion of some larger FHZs in areas of known fauna values
	<i>Option 2</i> Refine network	5		One submission supported refining the network of FHZs, so that there be less FHZs in areas where there are already high levels of reserved ecosystems, as in southern regions.	
'Silviculture for water production' in selected catchments	<i>Option 1</i> No change	2	1	Received a range of negative comments about thinning operations.	The plan provides for 'silviculture for water production', which involves silvicultural treatment to maintain or enhance water supply, with ancillary benefits for ecosystem health and vitality. 'Silviculture for water production' will be subject to approval of catchment management plans
	<i>Option 2</i> 'Silviculture for water production' applied to selected catchments	23	6	13 further submissions supported 'silviculture for water production' and ecosystem health in principle, but with qualifications. One submission supported both 'silviculture for water production' and ecosystem health, but suggested the application should be split. 12 submissions supported silviculture for ecosystem health only.	
Accounting for wood products salvaged after disturbance	<i>Option 1</i> All salvaged material counts towards the allowable cut	1		Three submissions rejected salvaging any wood product.	The Department will determine, based on a case-by-case basis, if wood arising from salvage harvests will count toward the allowable cut. The Department will take into account the likely public benefit, considering the costs and ability of affected areas to successfully regenerate and/or be successfully rehabilitated and provide for a range of ESFM values, in the absence of salvage harvest.
	<i>Option 2</i> Not all salvaged material counts towards the allowable cut	8			

Proposed change	Management Option	Support for	Opposed to	Additional input	Outcome
Arrangements for public firewood collection	<i>Option 1</i> Transport firewood to locations for collection	1		One submission opposed any collection of firewood. Eight submissions did not want any change to the current collection process. One submission suggested a new collection policy was needed, based around demand in population centres.	The Department, and where applicable in conjunction with the FPC, is to implement trials in selected areas of the three management options described in the Draft FMP. Subject to the results, the Department may seek to progressively reduce public firewood areas
	<i>Option 2</i> Thinning selected areas or accessing non commercial plantation lots	2			
	<i>Option 3</i> Firewood is only available from commercial operators	3	1		

Appendix 2c: Comments on sustained yield scenarios

Proposed change	Support for	Opposed to	Additional input	Outcome
Sustained yield scenarios (two scenarios contained a range of parameters, refer Table 7 page 106 of the Draft FMP)	39 submissions supported the scenario with lower sustained yields, or no change to current wood production levels. 40 submissions sought an increase in the wood production levels or no change to ensure economic security.		4,782 did not support native forest timber harvesting A number of submissions indicated that climate change had not been fully accounted for in the yield ranges for wood products.	Based on the sawlog sustained yields modelled for this plan, and assuming a continuation of the utilisation, silvicultural and industry settings as existed under the previous FMP, this plan proposes an average annual allowable cut of 132,000 cubic metres of first and second grade jarrah sawlogs, and 59,000 cubic metres of karri first and second grade sawlogs. This in turn would make available up to 292,000 cubic metres per annum of other bole volume of jarrah, 164,000 cubic metres per annum of other bole volume of karri, and 140,000 cubic metres of all bole logs of marri

Appendix 3: Summary of comments contained in pro forma submissions

Issue No.	Source	Issue	Analysis category	Response
1	WAFA	Opposes continued harvesting on native forest.	2e	The CALM Act provides for a management plan for State forest and timber reserves to have a purpose of native forest timber production on a sustained yield basis. Government policy supports a sustainable native forest products industry managed in accordance with the principles of ecologically sustainable forest management and the Proposed FMP provides for a native forest products industry in accordance with Government policy.
2	WAFA	The Draft FMP does not adhere to the principles of ESFM (is not precautionary, does not ensure intergenerational equity, biodiversity is not given first priority and does not correctly value the forests)	2d	The Proposed FMP is set out under the seven criteria for sustainability developed in the Montreal Process (the Montreal criteria) and aligns with the principles of ecologically sustainable forest management. The precautionary principle and long term sustainability are key elements of the Proposed FMP and the conservation of biodiversity is a fundamental consideration.
3	WAFA	Forests are not regenerating sufficiently to provide a habitat for threatened species, due to the short time between logging operations.	2d	<p>Monitoring of regeneration of forest by the FPC and DEC (including through FORESTCHECK) has found that regeneration was being effectively achieved across both the karri and jarrah forests. Nevertheless, additional provisions to enhance regeneration outcomes will be included in the revised silviculture guidelines, as outlined in the Draft FMP (see pages 120 and 122).</p> <p>In addition to detailing the required post-harvest treatments, silviculture guidelines include measures to minimise the potential impacts of timber harvesting on non-timber values, which focus on maintaining stand structural complexity and defining the type and extent of habitat elements and future ‘crop’ trees that must be retained. Habitat requirements (such as nesting, roosting and foraging needs) are considered in determining the criteria for selection and retention of habitat trees and coarse woody debris (for example, hollow logs) on the ground.</p> <p>The silviculture review expert panel (Burrows <i>et al.</i> 2011) found: <i>In summary, the Panel identified a number of relatively minor issues of potential concern (see below) regarding biodiversity conservation and silvicultural prescriptions that require attention, but overall, existing and proposed practices should sustain biodiversity and forest productivity at the local forest scale.</i></p> <p>Accordingly, further measures to protect biodiversity are outlined in the Draft FMP (see page 42). Note these additional measures are proposed even though research and long-term monitoring of the effects of timber harvesting on biodiversity, including that conducted through the Department’s major monitoring program, FORESTCHECK, shows that its impacts are relatively transient (Abbott and Williams, 2011).</p>
4	WAFA	Native timber harvesting is not ecologically sustainable.	2d	The Proposed FMP is set out under the seven criteria for sustainability developed in the Montreal Process (the Montreal criteria) and aligns with the principles of ESFM.
5	WAFA	Native forest timber harvesting is not economically viable.	2e	The Proposed FMP determines which areas may be available for timber harvesting and the management activities that need to be undertaken where harvesting is to occur. The issue of the economic viability of the industry is outside the scope of the Draft FMP.

Issue No.	Source	Issue	Analysis category	Response
6	WAFA	Opposed to development of any new 'low value' products. Timber should be supplied from sustainable alternatives such as plantations and farm forestry.	2e	Government policy supports a sustainable native forest products industry managed in accordance with the principles of ecologically sustainable forest management and the Proposed FMP provides for a native forest products industry in accordance with Government policy, which uses a range of log types. There are a range of potential benefits to improved utilisation of the available wood resources, including improved capacity to adapt to climate change with ecosystem health and water supply benefits, a greater contribution to climate change mitigation, improved silvicultural outcomes, increased sawlog production, and greater socio-economic benefits. There are existing plantations within the plan area. End-use of harvested logs is beyond the scope of the plan.
7	WAFA	The timber industry should be restructured towards sustainable plantation production.	2e	The CALM Act provides for a management plan for native forests on State forest and timber reserves to have a purpose of timber production on a sustained yield basis. Government policy supports a sustainable native forest products industry managed in accordance with the principles of ecologically sustainable forest management and the Proposed FMP provides for a native forest products industry in accordance with Government policy. Restructuring of the forest products industry, which can occur in line with market and other forces, is beyond the scope of the Proposed FMP. There are existing plantations within the plan area.
8	WAFA	The next FMP should plan for protecting native forests.	2d	The Proposed FMP provides for the protection and management of native forests according to the principles of ecologically sustainable forest management.
9	CCWA	Opposes any further logging of south -west forests	2e	The CALM Act provides for a management plan for native forests on State forest and timber reserves to have a purpose of timber production on a sustained yield basis. Government policy supports a sustainable native forest products industry managed in accordance with the principles of ecologically sustainable forest management, and the Proposed FMP provides for a native forest products industry in accordance with Government policy.
10	CCWA	Continued logging of native forests places threatened wildlife at a high risk of extinction. The FORESTCHECK monitoring system has failed. The EPA is requested to apply the same assessment criteria as used by the Commonwealth.	2d	Timber harvesting is dispersed in space and time across the available area and may affect up to 1.1% pa of forests on all lands vested in the Conservation Commission. Research and long-term monitoring of the effects of timber harvesting on biodiversity, including that conducted through the Department's major monitoring program, FORESTCHECK (which was established in response to an EPA recommendation following the assessment of a previous FMP), shows that its impacts are relatively transient (Abbott and Williams, 2011). The Proposed FMP is a CALM Act management plan under WA law. The Wildlife Conservation Act provides for declaration of threatened species using WA assessment criteria.
11	CCWA	There should be no further destruction of marri trees which are critical to the survival of WA's endangered black cockatoos, yet the Draft FMP proposes increased logging.	2d	The Proposed FMP notes the importance of marri trees for black cockatoos and corresponding modifications to silvicultural practices are outlined in the Draft FMP (see page 42).
12	CCWA	The Draft FMP has failed to properly assess the impact of logging on Aboriginal cultural values of south-west forests.	2d	Resulting from amendments to the CALM Act in 2011, one management objective for the Proposed FMP is to "...protect and conserve the value of the land to the culture and heritage of Aboriginal persons". Consequently, The Proposed FMP identifies Noongar culture and heritage values and proposes a process for ongoing evaluation of the values. The Proposed FMP includes management activities that seek to prevent material adverse effects on Noongar culture and heritage values from disturbance activities.

Issue No.	Source	Issue	Analysis category	Response
13	CCWA	The Department of Environment and Conservation lacks the powers to enforce compliance with the FMP.	2d	<p>In the mid-term audit of performance of the current FMP, concern was expressed regarding the legislative clarity of the Department's relationship with proponents and how they operate on Department-managed land (see Conservation Commission 2008). In the same report, the Conservation Commission also raised issues concerning roles and responsibilities. The EPA, in its report and recommendations on the mid-and end-of-term audits of performance on the current FMP (EPA 2010 and 2012), advised that the next (i.e. this) FMP should aim to clarify the statutory roles and responsibilities of the Department and the FPC.</p> <p>Accordingly, in the Proposed FMP, it is intended that the interagency arrangements between the Department and the FPC be formalised in writing to clarify and improve the current arrangements, and by the creation of several key additional elements. This includes that the Department is formally recognised as the regulator.</p>
14	CCWA	The FMP totally fails to manage the impact of logging operations on natural carbon stocks. The EPA must require a thorough audit of carbon stocks in south-west forests.	2d	Information relevant to this is included in the Draft FMP (pages 88-91). The Draft FMP included two scenarios for the calculation of sustained yield (see page 106), along with projected changes in the indicative carbon stocks for the major forest types under each scenario (see page 93). The Proposed FMP includes a goal of seeking to sustain the contribution to global carbon cycles and a range of management activities to that end and includes a key performance indicator related to improvements in knowledge about carbon storage.
15	CCWA	The Draft FMP does not comply with principles for ecologically sustainable forest management and there has not been any assessment of alternative uses for the forests such as the generation of carbon credits.	2d	<p>The Proposed FMP is set out under the seven criteria for sustainability developed in the Montreal Process (the Montreal criteria) and aligns with the principles of ecologically sustainable forest management. The precautionary principle and long term sustainability are key elements of the Proposed FMP and the conservation of biodiversity is a fundamental consideration.</p> <p>The Draft FMP contained the first indicative estimates of native forest carbon stocks on lands vested in the Conservation Commission in the plan area, including areas subject to native forest timber harvesting.</p> <p>The Proposed FMP is not the vehicle for determining an economic value for forest carbon. Notwithstanding this, the economic value of forest carbon could be investigated if and when a more certain carbon market emerges, and the Proposed FMP includes a management activity to this end.</p>

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Tracy Leigh
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Traudel Weber
Travis Arthur
Travis Kroonenburg
Travis Tanner
Treana Jones
Trent Rachow
Trevor Clark
Trevor Coulter
Trevor Harrison
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Trevor Pedderson
Trevor Vowles
Trevor Whitton
Tricia O'Reilly
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Trish Brown
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Tristian Abbott
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Troy Rasmussen
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Ttedesco49
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Tyson Cherrie
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 Wendy Claxon
 Wendy Dugmore
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Zuzanna Kania

Glossary of Acronyms and Abbreviations

BAM Act	<i>Biosecurity and Agriculture Management Act 2007</i>
BRM	Basic raw materials
CALM Act	<i>Conservation and Land Management Act 1984</i>
CAR	Comprehensive, adequate and representative – as applied to the conservation reserve system
CSIRO	Commonwealth Scientific and Industrial Research Organisation
DEC	Department of Environment and Conservation
Draft FMP	Draft Forest Management Plan 2014-2023
DMP	Department of Mines and Petroleum
EPA	Environmental Protection Authority
EP Act	<i>Environmental Protection Act 1986</i>
EPBC Act	<i>(Commonwealth) Environment Protection and Biodiversity Conservation Act 1999</i>
ESFM	Ecologically sustainable forest management
FHZ	Fauna habitat zone
FMP	Forest Management Plan
FP Act	<i>Forest Products Act 2000</i>
FPC	Forest Products Commission
IOCI	Indian Ocean Climate Initiative
KPI	Key performance indicator
PER	Public Environmental Review
Proposed FMP	Proposed Forest Management Plan 2014-2023
RFA	Regional Forest Agreement
WC Act	<i>Wildlife Conservation Act 1950</i>