



Government of **Western Australia**
Conservation and Parks Commission

Analysis of Public Submissions
On the
Draft mid-term review of performance of the
Forest Management Plan 2014-2023

February 2019

INTRODUCTION

The Conservation and Parks Commission (Commission) committed to undertake a mid-term and end-of-term performance review as part of management activities in the Forest Management Plan 2014-2023 (FMP).

The Commission's purpose is to act as an independent and trusted community steward and government advisor for the protection of Western Australia's biodiversity and conservation estate while fostering its appreciation and sustainable use. As there is no formal or legal requirement for the review to be submitted to the Environmental Protection Authority, the Commission incorporated a public comment period of six weeks as part of its mid-term performance review.

In informing the public of FMP implementation performance, public comments were sought on the KPI and management action outcomes and the proposed Commission responses to any shortfall in performance targets. These submissions have assisted the Commission in finalising its report to the Minister for Environment.

This document provides a summary and analysis of the public submissions to the *Draft mid-term review of performance of the Forest Management Plan 2014-2023* (draft mid-term review).

Objective of the review

The primary objective of the review is to assess '*the extent to which management of land to which the plan applies has been undertaken in accordance with the plan*' which includes consideration of the extent to which all FMP key performance indicator targets have been achieved.

Management reviews occur at planned intervals to help ensure the FMP is achieving the desired goals. The performance review includes analysing results, identifying underlying causes and developing recommendations to improve performance.

The Commission has consulted with appropriate and representative Noongar groups on the results of the review as detailed under FMP management activity 130. The mid-term review of performance of the Forest Management Plan 2014-2023 report (mid-term review) will be made publicly available on completion.

Methodology

Pursuant to Section 33 (1)(b) and (ba) of the *Conservation and Land Management Act 1984* (CALM Act), DBCA is to provide assistance to the Commission as may be reasonably required for the Commission to perform its functions.

As a review, it has been determined to be appropriate for the managing agencies which are responsible for the delivery of most of the FMP management activities to undertake a self-appraisal of both the management activities and the key performance indicators. As such the level of achievement attributed to each KPI was determined by the Department of Biodiversity, Conservation and Attractions (DBCA) or the Forest Products Commission (FPC), where relevant, and provided to the Commission to enable the review. The mid-term review reports on 24 key performance indicators (KPI) established in the FMP and includes a report card which details progress on the implementation of the 134 management activities in the FMP.

The information provided, self-assessment results and subsequent public submissions were analysed by the Secretariat of the Commission. A sub-committee of the Commission has then considered these results and made recommendations where deemed appropriate for endorsement by the Commission.

The six week public comment period from 10 September to 19 October 2018, and the supporting actions outlined below, meet the requirements for the FMP Management Activities 130, 131 and 132.

The release of the draft mid-term review for public consultation was supported by:

- ◆ media statements from the Minister for Environment and the Commission;
- ◆ advertising in *The West Australian* on Wednesday 10 September 2018;
- ◆ publishing articles on the Commission and the DBCA websites;
- ◆ emailing stakeholders with notice of release;
- ◆ providing digital and hard copies to stakeholders on request;
- ◆ making hard copies available for public viewing from the State Library and Conservation Library in Kensington; and
- ◆ making hard copies available from the Kensington office of the Conservation and Parks Commission.

During the review period, the Secretariat of the Commission was available to stakeholder groups and the general public to provide information and clarification regarding the review process.

Meetings were held with legal officers responsible for the six Aboriginal Working Parties representing native title claimants in the area of the plan and the South West Aboriginal Land and Sea Council.

Submissions received

A total of 2177 submissions were received from individuals, companies, local government, government agencies and non-government organisations. 97 per cent of submissions reflected a proforma submission promoted by the Conservation Council of Western Australia (CCWA) and the Western Australian Forest Alliance (WAFA).

The submissions have been considered and, where appropriate, comments or issues from the submissions have been addressed in the *Mid-term review of performance of the Forest Management Plan 2014-2023* (mid-term review). The mid-term review will be submitted to the Minister for Environment.

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

Category	Number
Proforma submission	2123
Individuals and companies	37
Non-government organisations	15
Government agencies	1
Unknown	1
Total	2177

ANALYSIS OF SUBMISSIONS

Based upon the submissions received during the public comment period, the Commission has taken steps to clarify a number of aspects of the draft in the process of finalisation of the report.

Where submissions have provided additional information or detailed apparent omissions or corrections, the report has been adjusted accordingly. Many submissions were not directly related to the primary objective of the review (i.e. the extent to which management of land to which the plan applies has been undertaken in accordance with the plan) and were determined to be out of the scope of the review. There were some submissions which requested that the plan be amended or replaced. The Commission has determined that ongoing evaluation of the need for revision of management practices in the context of its assessment and auditing function and the refinement of the guidelines and policies referred to in the plan are sufficient means of continually improving performance.

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.

Submissions have been formally registered in the Commission's records management system. Some submitters appeared twice by sending the same response or provided additional information to the Commission's email address. These submissions were only counted as one. An additional 22 submissions were received via email and letters.

Pro forma submissions

The majority of submissions followed a pro forma promoted by the CCWA and Wafa (Figure 1). The Commission considered the content of the proforma including those that were modified as contributing opinion rather than fact and as they contained no new information, the proforma submissions were noted. The modified wording from 86 of the proforma submissions have been compiled in Appendix A. Of the 86 modified submissions, three were supportive of the FMP and the remaining 83 submissions expressed opinions primarily reflecting a general opposition to logging of native forests.

Online, email and mail submissions

32 submissions were made through the Conservation and Parks Commission's webportal (www.conservation.wa.gov.au) using the online form which included a basic questionnaire with the opportunity to provide free text responses and an attachment. A summary of the 32 online responses to the questionnaire is provided in Appendix B (contact details, free text and attachments excluded).

25 submissions were made via direct email and letters to the Commission. It should be noted that three submissions were effectively by the same submitters either doubling up on previously submitted information via the online portal or providing additional information to their original submission. Therefore, in total there were 54 submissions from different organisations or individuals (noting that each submission was still allocated a code from 1 – 57).

All written submissions were considered. As the Key Performance Indicators related to relevant chapters of the FMP, the review identified key themes under each chapter (or key performance indicator grouping) Table 2 shows the comments from submissions under each theme with the related response by the Commission.

Figure 1: Template of proforma submission promoted by WAFA and CCWA

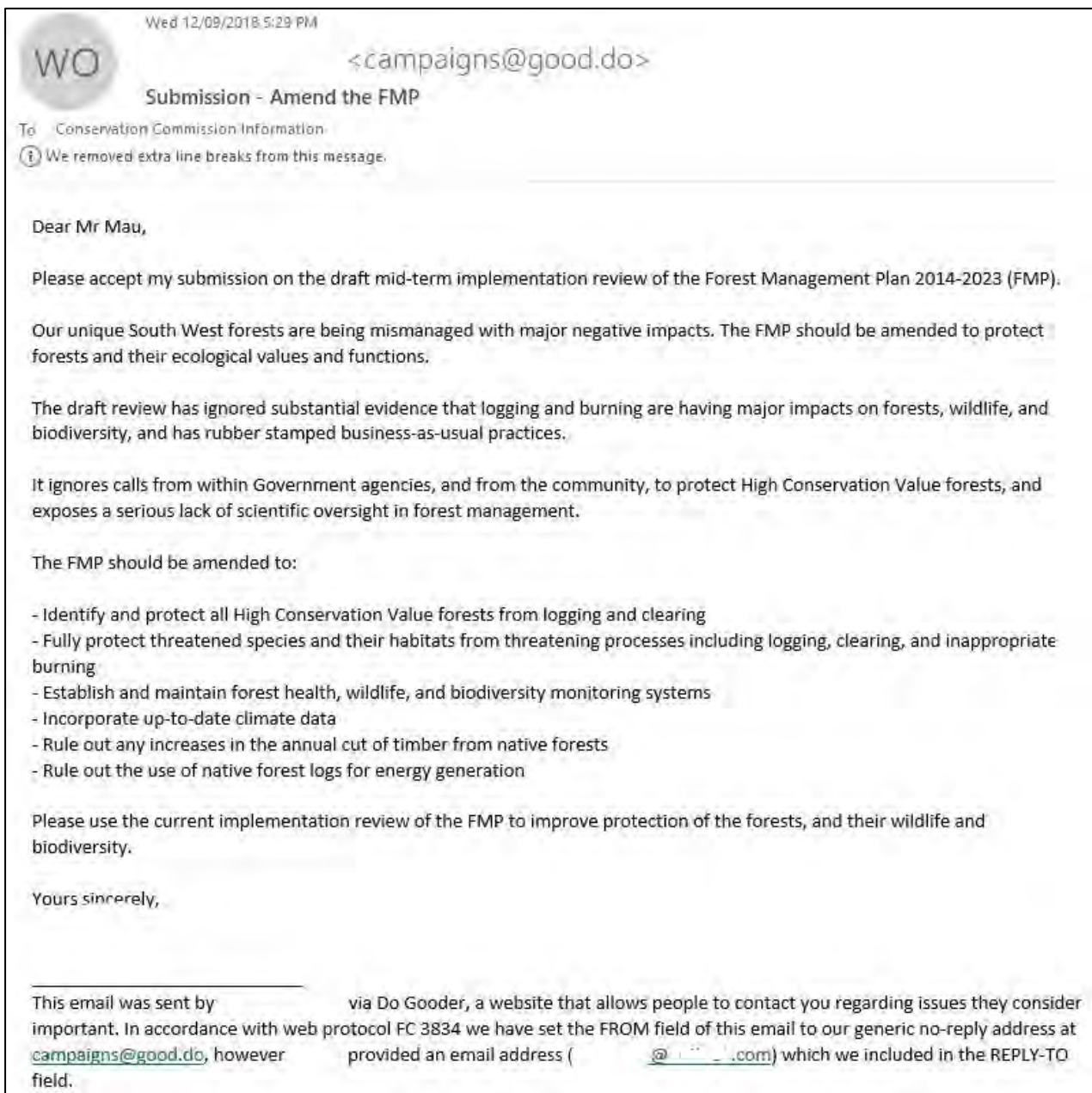


TABLE 2: ANALYSIS OF PUBLIC SUBMISSIONS – ONLINE SURVEY, EMAILS AND LETTERS

Ref Number	Theme	Public comments	Response
Progress on Management actions and Evaluation of Effectiveness			
3, 7, 10, 15, 16, 18, 19, 20, 23, 24, 26, 32, 38, 40, 41, 42, 46, 49, 53, 55	Management resourcing	<ol style="list-style-type: none"> 1. Lack of resources for monitoring 2. How are KPIs measured: self-assessment is not acceptable when looking after such a valuable natural asset. 3. Lack of resources may result in stakeholders having low confidence in the interpretation of results. 4. Budget reductions in the order of 50% cannot but reduce the quality of services provided, regardless of the quality of prioritisation and streamlining by staff. The extent of Departmental budget reductions is evident through the manner in which some KPIs have been measured in the FMP, and the conclusions that are drawn from those measurements and assessments. 5. Variable implementation – insufficient resources committed by government and its agencies leading to a serious shortfall in achievements 6. Given community expectation for forest reserves, and Government commitment for tenure of NPs, it is disturbing that the need for management resources (addressing pests, disease, weeds, fire, controlled access) is not supported. 7. The audit indicates some restrictions to meeting management plan actions due to availability of resources. It raises the issue of attribution of impacts to climate change versus forestry activities. Where the case for attribution is not clear, further research should be undertaken 	<p>Numerous submissions identified concerns at the changes in resource availability during the first half of the FMP as reported in the draft review report. The Department advised through the draft report that the tight fiscal environment in 2014 and subsequent years resulted in the Department’s budget for coordinating the implementation of the plan, regulating the yield, delivering services and monitoring implementation declining by up to 50 per cent since 2014.</p> <p>As outlined in the draft report, the FMP requires sufficient resources to enable its implementation. The Commission has included additional content in the review report to emphasise its concerns on resourcing the implementation of the plan as follows:-</p> <p><i>‘While the key performance indicator results provided to the Commission do not include any measures of efficiency by which to monitor the relationship between the results delivered and the resources used to produce the result, it is clear that implementation of the FMP has been constrained. Implementation of the FMP requires adequate resources, however, resourcing is outside the scope of the plan and this review and is managed through ongoing government budget processes’.</i> (see page xii)</p>
5, 7, 8, 10, 16, 26, 32, 38, 51	Performance indicators	<ol style="list-style-type: none"> 1. No clear targets, standardised methods, and species management priorities for TECs, wetlands, threatened flora and fauna required for FMP mid-term review. 2. Lacking supporting data from draft Regional Nature Conservation plans. 3. The information provided in the draft mid-term review is brief therefore limiting the opportunity to examine and discuss important factors. 4. Too many KPIs for an organisation to focus on. 	<p>Issues related to specific KPIs are addressed within this table as identified for each section. Broader issues related to the number and breadth of KPIs, relevance and outcome focus have been noted and will be considered in the continuous improvement of the KPIs for the next FMP.</p> <p>Technical terms used in the mid-term report are consistent with the meanings as defined in the Forest Management Plan.</p> <p>Through the mid-term review report the Commission has acknowledged limitations in the provision of information</p>

		<ol style="list-style-type: none"> 5. The Regional Conservation Plans themselves do not have performance targets. 6. The lack of effective linkage between the FMP and RCNPs demonstrates flawed nature of forest management in WA. 7. Need for improvements in performance measures should not delay or prevent the implementation of specific and immediate changes to burning and logging practices or improvements in hygiene and weed management. 8. We believe that the confined scope of the review cannot properly address the bigger and more important questions of the adequacy of the FMP in meeting its stated objectives. 9. KPIs not outcome focussed. 10. Where KPIs refer to definitions, those definitions should be made explicit and included in the text. 11. KPIs do not reflect the full value of the forest or a full range of forest resources (e.g. intrinsic values) 	<p>through subsidiary planning documents, in particular the Regional Nature Conservation Plans. Subsequently, appropriate recommendations have been included seeking to ensure that further information will be made available within 12-24 months of the release of the mid-term review of performance report.</p>
<p>16, 26, 29, 32, 49, 53</p>	<p>Application of precautionary principle</p>	<ol style="list-style-type: none"> 1. Unacceptable that FMP practices are allowed to continue without adequate science to inform activities to ensure ESFM. 2. Adoption of precautionary principle to create new reserves in order to protect specific areas of high rainfall, upland, Northern Jarrah forest from bauxite strip mining (a total area of 25,000 ha of Jarrah forest has been cleared and mined since 1963 and a subsequent area 4-5 times larger has been fragmented) – significant potential for further mine expansion. 3. Due to climate change, the likelihood that jarrah and karri forest logged now will be able to regrow as forest with similar biodiversity is low in those regions most affected by climate change. 4. Feasibility of continuation of two extensive land uses of timber extraction and bauxite mining (in the Perth to Collie corridor) which overlap with all other land uses, active threatening processes and climate change are producing at best forest which lacks the majesty of old growth jarrah forest, and at worst will veer towards a jarrah-marri woodland. 	<p>In developing the desired goals of the FMP2014-23, the former Conservation Commission adopted a precautionary approach as required under CALM Act s19(2)(b). At the time of developing the plan the Commission was particularly concerned with the vulnerability of forests to climate change. The effects of weed, pest and disease infestations and changes in weather patterns were assumed to continue during this period of the plan the State's south-west. Given current knowledge and uncertainties of the likely magnitude and result of changes to climate, it is still considered that the management activities within the plan encompass an appropriate range of precautionary actions.</p> <p>The Commission has noted the range of actions already implemented and acknowledges that for some field actions ongoing monitoring and evaluation of outcomes will be necessary to inform future adaptation strategies. In the review report, the Commission has recommended a greater consideration of data accumulation supporting biodiversity indicators to assist in assessing adaptive management outcomes. Further research and monitoring will be required on a prioritised basis to adapt to and mitigate the impacts of climate change.</p>

Ref Number	Theme	Comment	Response
Biological diversity (KPIs 1 – 5)			
7, 8, 12, 14, 16, 18, 21, 23, 32, 33, 41, 43, 49, 52, 53	Whole of forest condition	<ol style="list-style-type: none"> 1. Patterns of vegetation decline variable and appear to be related to terrain and landform – important to understand 2. What about impact of harvesting, roads, drying climate, per- and polyfluoroakyl substances (PFAS) ? 3. The review abdicates all responsibility for thinning of vegetation density and decreases in fauna claiming climate change as culprit rather than management actions 4. Evidence showing areas of the northern jarrah forest along its western edge declining (#15 p.51) 5. Research has shown that is not just climate change that can dry out a landscape, but also clearing and logging (References: Gale C.2006, Prof J Kirkpatrick, M A Andrich and J Imberger, Prof CI Macalpine) 6. MacFarlane et al (2010) showed that regrowth jarrah forests transpire up to 50% more than old growth jarrah forests (including those old growth not meeting new DBCA guidelines) 7. The 2011 Jarrah-Marri forest stand collapse event was greatly underestimated by the Commission's and DEC 2013 report at only 3000 ha; extensive Murdoch University research showed the extend to be approximately 16,500 ha (i.e. between 5 – 8 % of the western jarrah forest) 8. The wording of 'vegetation density' confuses the general reader with structural density of tree stems per hectare. It should be described as 'canopy density' to avoid confusion. 9. Rapid expansion of areas for future bauxite mining activities especially in response to the recently approval for the export of unprocessed bauxite means the Commission should ensure there is an adequate representation of reserves in high quality, high-rainfall areas of the northern jarrah forest. 10. More than half of the most affected areas are in conservation reserves. 11. Concerned that the major method used to assess changes in whole of forest health appears to be LANDSAT imagery with no evidence of supporting ground-truthed information. 12. The FMP should be able to provide both a whole-of-forest picture for biodiversity and ecosystem health, as well as 	<p>The submissions raise a number of points with key comments relating to the adequacy of the information provided for the review and the response recommendations and proposed Departmental actions.</p> <p>After noting the comments and the additional background, the recommendation for further information on the affected forest ecosystems was confirmed as adequate with only a minor change to recommendation 1 from the draft mid-term review.</p>

		<p>measure the performance of each area managed under different land uses.</p> <p>13. Areas of declining forest health do not appear to be equal in the north-eastern and lower rainfall parts of the forest with north-eastern aspects much more severely affected.</p> <p>14. The target should not just focus on 'healthy' ecosystems or define what 'healthy' means.</p> <p>15. What is the reason for the lack of gazettal of new reserves?</p>	
2, 6, 7, 12, 13, 16, 21, 22, 28, 32, 39, 49, 52, 53, 54	Threatened flora, fauna and ecological communities	<p>1. Concerns raised on high percentage of declining or unknown status of species and communities in regions indicating that the forest is not being managed properly for the long term.</p> <p>2. Scientific information shows that black cockatoos and western ringtail possums rely on more mature trees yet statement "there is no evidence to suggest timber harvesting has long term impacts on population viability" [NB: information source to support statement dates back to 1992].</p> <p>3. Further decline of our native forests since the last mid-term review 10 years ago – some protocols missing in the last FMP still missing in the current FMP</p> <p>4. Prime banksia woodland habitat for Carnaby's develops 20-29 years after a burn; in Gngalara over 60% of the woodlands have been burnt in the last 7 years. The remainder is estimated to be able to support 2726 Carnaby's which amounts to only 25-35% of the species reliant on the area (#16; Wafa Forest Science forum)</p> <p>5. The scarcity and on-going loss of nesting hollows is the principal driver of extinction for Baudin's cockatoo.</p> <p>6. Quokka and numbats have not even been mentioned in this review.</p> <p>7. More science needed on KPI 4 & 5</p> <p>8. Most threatened ecological communities listed are on the Swan Coastal Plain not in the forests. Should be mentioned in text.</p> <p>9. Further information regarding specific threats from logging, clearing and fire should be included in the final review document to properly cover the issues and provide for meaningful improvements to the FMP.</p> <p>10. Conduct an independent review of regionally significant vegetation outside of the formal conservation reserve system with a view to recommend HCV areas for inclusion in reserve</p>	<p>KPI 2</p> <p>Changes have been made to the review report to clarify that Table 2 contains TECs and PECs that have been identified as priorities for management (with noting for TECs also listed under the EPBC Act). The final report also includes a statement acknowledging the relationships between climate and other related impacts. The relevant recommendation has been reworded for clarity as follows:-</p> <p><i>Recommendation 3. That the measurement protocols for KPI 2 be reviewed by January 2020 to ensure sufficient detail at the FMP end of term review to determine whether the observed changes in condition have been adequately attributed and managed.</i></p> <p>KPI 3</p> <p>The draft Regional Nature Conservation Plan (DRNCP) for Swan references FMP KPI 3 and the measure, 'staying within 'Limits of Acceptable Change' within Ramsar framework'.</p> <p>The DRNCP for Warren region references a general requirement to meet FMP reporting requirements and states 'Wetland monitoring program data is comprehensively reported every two years internally and every three years to meet federal Ramsar requirements'.</p> <p>The DRCP for South-west references a general requirement to meet FMP reporting requirements and states that "wetland monitoring program data is comprehensively reported every two years internally and every 3-4 years to meet federal Ramsar requirements."</p> <p>The Commission noted the intent from the Department in its response to review the regional nature conservation plans thus informing amendments to the measurement protocols for Ramsar and nationally significant wetlands. Given the level of reporting under other terrestrial</p>

		<p>system.</p> <ol style="list-style-type: none"> 11. Studies indicate a long term impact on population viability of hollow dependent western ring tail possum (i.e. Wayne et al 2006, Wayne et al 2000) and to suggest otherwise is misleading i.e. mid-term review “there is no evidence to suggest timber harvesting has long term impacts on population viability” 12. Both Baudin’s cockatoo and the numbat were moved from Vulnerable to Endangered under the EPBC Act in February 2018 and the western ringtail possum was listed as Critically Endangered in May 2018. None of these species at increased risk of extinction is mentioned in the draft review. 13. As of 2017, we have 147 listed flora species and 120 threatened fauna. How will DBCA implement/continue to implement monitoring and surveys of threatened flora and fauna populations and review the draft RCNPs if there are no performance targets available? 14. An 2017 assessment of condition of the Peel-Yalgorup Ramsar site for Limits of Acceptable Change (LAC) found that 19 were met, 22 not met and 18 had insufficient data to assess – this differs from the mid-term report’s assessment that 11 of the 37 LACs are regularly exceeded (noting also the use of the terminology ‘regular’ as few LACs are regularly monitored). 15. Commission should re-assess KPI 3 performance in the context of the recommendations of the 2006 Auditor General’s Report on Management of Ramsar Wetlands in WA and request the department of clarify the involvement of non-government and community groups in the management of Ramsar wetlands. 16. Will the Commission make all RNCs publicly available? 	<p>management planning and the Ramsar convention, this Departmental response was considered adequate and the draft recommendation for this section was removed with the following words included into the report: “a <i>continued collaborative approach with stakeholders who are actively engaged in the management of these wetlands</i>”.</p> <p>KPI 4</p> <p>To enable the Commission to gauge the effectiveness of management response to reported declines in condition further information on the cause of the decline (the review provides a general statement that “<i>the changes in population size can be the result of a range of factors</i>”) has been included in a more specific Recommendation 4.</p> <p>Amended recommendation 4:</p> <p><i>For the flora species detailed in this review as critically endangered in 2017 with a recorded decrease in population size, that the Department provides further information to the Commission detailing measurement and analysis of changes in population number and/or size as a function of time by July 2021.</i></p> <p>KPI 5</p> <p>In relation to the points raised on the reference to the studies by Wayne related to the Kingston trials and the comments on the removal of mature trees, it was decided to modify the report wording and references to be more reflective of current silvicultural practices and the wording of the FMP itself as follows</p> <p><i>‘Long-term research and monitoring, including that conducted through the Department’s major monitoring project, FORESTCHECK, show that forest biodiversity is resilient to disturbance from silvicultural operations... FORESTCHECK monitoring showed that in the jarrah forest ‘for all species groups studied’ (vascular flora, macrofungi, lichens bryophytes mosses, macroinvertebrates birds and terrestrial vertebrates) ‘the imprint of harvesting 40 or more years earlier on species composition had become indistinguishable from that on grids never harvested’ (Abbott and Williams 2011).’</i></p> <p>There were two fauna species in particular identified in the comments which changed conservation category (Baudins cockatoo – transferred from Vulnerable to Endangered; and the numbat shifted from transferred from Vulnerable to Endangered) but were not included in the draft review reporting under this KPI.</p>
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			<p>In relation to the general points raised relating to a perceived inadequacy in the recommendations, it is recommended to refine the recommendations to provide more specific requirements.</p> <p>Amended recommendation 5:</p> <p><i>“That the Department provides further information to the Commission by July 2021 on the measurement and analysis of change in population number and/or size as a function of time for key threatened fauna identified in the measurement protocol for KPI 5 including Carnabys cockatoo, red-tailed black cockatoo, Baudin’s cockatoo, quenda, quokka, brushtail possum, western ringtail possum, chuditch, woylie, numbat, brush-tailed phascogale, Geocrinia frogs, and sunset frog.”</i></p>
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Ref Number	Theme	Comment	Response
Ecosystem health and vitality (KPIs 6 – 8)			
7, 13, 16, 21, 24, 25, 27, 32, 45, 46, 49, 50, 52, 53, 57	Implications of fire management	<ol style="list-style-type: none"> 1. KPI 6 – more informative if figure shows distribution of time since fire distinguished between bushfire and prescribed burns. 2. KPI 7 – superficial as it does not provide useful information around objectives, success criteria, and how outcomes of burning were monitored. Should be expanded to provide more detail on the actual success criteria achieved/not achieved within the respective Regional Fire Management Plans. 3. DBCA has not completed Regional Fire Management Plans to guide decision making and operations. 4. The KPI framework does not address the potential for forest fire (planned and unplanned) to impact on biodiversity or forest health. 5. Implications of changed seasonality of burns to spring rather than autumn 6. The target distribution of fire age is a function of inputs relating to the life history attributes of native vegetation. The reference cited for this is 17 years old (McCarthy et al 2001) 7. Lack of data relating to prescribed burning, evidence about survival of species under different fire regimes is at odds with the procedures and KPIs outlined in the FMP. 8. Evaluate the merits of more risk-based targets and KPIs for prescribed burns as Victoria has done rather than ones based on area of land burnt. 9. Application of precautionary approach – involving varied inter-fire intervals, not just a mosaic based on geographical variability while other burn parameters remain constant. 10. Fuel around pine plantations should be no older than 5 years 11. Conduct an assessment via an independent expert panel on the impacts of the current prescribed burning program on biodiversity and climate change. 12. The ecological consequences of the fire management program with more regular burns has been overlooked in this draft review. 13. All three draft regional nature conservation plans list inappropriate fire regimes as a threat to species and their 	<p>Given the uncertainty around the losses in vegetation density, it is considered that more information is required to enable the Commission to form a view on the implementation of this aspect of the FMP. As such Recommendation 8 has been altered to request more specific information on each LMU (consistent with the current measurement protocols for KPI 8) rather than calling for a general review of the measurement protocol.</p> <p>Amended recommendation 6: <i>“That the Department report to the Commission by July 2019 on the conformance to the theoretical distribution of time since fire for each LMU.”</i></p> <p>In responding to this submission, it was noted that the information presented in the draft report represents only a single year in the reporting period and of that year approximately only one third had information reported against the success criteria. However, the KPI was reported as fully achieved with high confidence. As such the level of confidence in the allocated score has been reviewed from High to Medium to better reflect the small sample size presented.</p>

		<p>habitat.</p> <p>14. Risk mitigation of bushfires to human populations and assets can be assisted by Mechanical Fuel Reduction.</p>	
7, 16, 23, 41, 49	Weed management	<ol style="list-style-type: none"> 1. KPI 8 performance is based on an estimated 36 sites where long term management actions were applied, not an extensive assessment of the hundreds of reserves and thousands of public conservation estate in the FMP area – need to re-assess KPI 8 using a credible methodology. 2. KPI 8 – showing a bias towards locations on Swan Coastal plain rather than main forest zone (i.e. does it reflect weeds are not a major problem across forest landscapes?) 3. Review fails to mention substantial weed burden present in softwood plantations (e.g. blackberry); there is little to no effort to manage weeds in plantations. 4. Develop clear management principles to ensure that dieback and weeds are not spread during the process of ecological thinning, should it be undertaken. 5. No evidence is provided to support what intensity of investigations was used to identify and record new infestations, or measure changes in the distributions of infestations. 	<p>Submissions have reinforced that limited information is provided on the process and outcomes of the prioritisation of weed management as it relates to the service plans.</p> <p>The KPI protocols detail the required data and reporting frequency for weeds and pests and the recommendation has been altered to reflect the requirements of the protocol and for clarity.</p> <p>Amended recommendation 8:</p> <p><i>“That the Department reviews the measurement protocols and prioritisation process for weeds and pests by January 2020; and provides further information to the Commission by January 2021 detailing the distribution or density of number and population density of on priority pests and weeds in the FMP area.”</i></p>
14, 32, 50, 54	Soil damage and pathogens	<ol style="list-style-type: none"> 1. There is no mention of soil damage other than caused by vehicles, for example, exposure to erosion following clear-fall logging. 2. KPI 9 should include soil damage resulting from fire management in order to provide for the measurement of soil carbon and nutrient losses as well as erosion. 3. Complete removal of the topsoil for 100% of a forestry area would not trigger an adverse KPI assessment because ‘damage’ refers to mixing of the soil horizons. 4. Roading used in logging operations facilitates transport of sedimentary run off from soils and causes salinity contamination of water supplies in dams. 5. <i>Phytophthora</i> species other than <i>P. cinnamomi</i> increasing concern i.e. symptomology different with individual plants killed and identifying these is more difficult than ‘dieback fronts’ (#14 p.52). 6. KPI 8 - Recommendation could include “working with relevant NRMs and community groups to ensure Green card training (and other relevant <i>Phytophthora</i> dieback management activities) is more widely implemented across the community”. #15 p.53 	<p>Soil compaction is factored into the soil assessments by default based on research trials. Research into changes in soil bulk density resulting from vehicle movement showed that significant soil compaction occurs on the primary and secondary extraction tracks. The extent of this compaction is not always visible from the surface. Based on these results, default disturbance categories relating to the order or hierarchy of the extraction track have been determined. The Commission is satisfied with the number of surveys undertaken and the commitments to continuously improving processes to ensure that the targets for this KPI can be met in the future. The point raised in relation to increased traffic in relation to extraction of other bole volume was identified through Departmental monitoring as follows: <i>“The main contributing factors where limits were exceeded were that the volume of wood removed including increased residue and other bole volume required significant vehicle traffic”</i>, and will be noted by the Commission for future monitoring and planning.</p>

Ref Number	Theme	Comment	Response
Soil and water (KPIs 9 - 11)			
3, 4, 7, 14, 16, 20, 21, 22, 23, 32, 33, 42, 43, 44, 46, 50, 52, 54	Ecological thinning	<ol style="list-style-type: none"> 1. The inability to utilise other bole volumes in jarrah forest is inhibiting the attainment of forest health and productive capacity objectives. 2. Potential for silvicultural treatment to increase water yield from catchments in higher rainfall parts in State forest needs more attention (see also Croton et al (2014)). 3. Silviculture to enhance streamflow and groundwater in economic efficient manner where sale of wood products generated by thinning can offset the cost of treatment. 4. The FPC needs to undertake trials between now and 2024. 5. Past research brings into question the broader effectiveness of silviculture treatments as a way to improve stream conditions. 6. No thinning until results of small long-term trials (10 years) in regrowth jarrah forest run by independent forest ecologists with community involvement and EPA assessment. 7. Support innovative intervention management especially in more eastern jarrah types, and recovery of forest products where feasible. 8. To allow strong trees to grow, the Jarrah-Marri forest will not only sequester more carbon but also greatly improve the resource efficiency i.e. if the size in sawlogs can be doubled by 2035 the timber that would be produced would be quadrupled. 9. Thinning for ecosystem health and water production. 10. Thinning increases the spread and intensity of dieback in infested forest and causes long-lasting ecological harmful soil compaction. 11. Silviculture treatment in regrowth forests vital for forest health in drying climate and maintaining productivity. 12. Concern about previously logged forests prior to thinning practices (stem density too high in conservation estate). 13. Need to acknowledge thinning as a biodiversity protection and enhancement tool 	<p>Historically, the main risk to water quality has been from groundwater rise dissolving and transporting salt stored in the unsaturated zone of the soil profile. As a result of the decline in groundwater levels over recent decades, in this plan, the phased harvesting requirement no longer applies in the Department's Swan and South West regions and parts of the Warren Region.</p> <p>To ensure timber harvesting and associated forest management activities do not result in unacceptable changes to water quality, rivers and streams are included in the informal reserves system. The impacts of fire on water quality in catchments is not specifically reported under the performance measures for this KPI but will be considered for future planning.</p>

		<p>14. Access state and federal research grants to further study ecological thinning</p> <p>15. It is particularly disturbing when areas with insufficient management resources applied are often past managed forest regrowth areas, including timber production, that are being allowed to decline in condition.</p>	
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Ref Number	Theme	Comment	Response
Climate change and carbon cycles (KPIs 12 - 14)			
7, 10, 12, 24, 32, 33, 38, 40, 46, 52, 53	Increase knowledge of carbon stocks	<ol style="list-style-type: none"> 1. Carbon storage understanding essential for limiting global warming. 2. Review speaks of climate change contributing to forest degradation yet fails to recognise the importance of forests in combatting climate change. 3. The department should ensure that carbon stores recognise and account for the carbon that is stored in the build environment from the use of forest products (recognised in Federal Government approved carbon model FullCAM – eligible for trading). 4. A 2012 Australian National University assessment of carbon pollution from forest management in WA suggested that logging of FMP forests in WA results in a net carbon pollution of between 1.8 and 2.9 million tons of CO2 per year. 5. Will the other forms of forest measurements, including woody biomass, provide adequate information to address the original objectives of the FMP. 	Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.
13, 21, 32, 38, 40, 46, 49, 52	Adaptive response to climate change	<ol style="list-style-type: none"> 1. Macfarlane <i>et. al.</i> showed in 2010 that regrowth jarrah forests transpire up to 50 per cent more than old growth jarrah forests. 2. Old forests store more carbon and have greater climate benefits than regrowth forests (various papers quoted in #13 p.5). 3. Recommended that there be no logging or clearing of mature forests in areas where rainfall is below, or projected to soon be below, the annual amount required for the maintenance of the ecosystem (minimum 600mm for jarrah and 1000mm isohyet for karri) and sustainable yield re-calculated accordingly. 4. There is ample scientific evidence demonstrating that logging results in a significant net loss (emission) of carbon from forests. As such, and according to the precautionary principle, the lack of monitoring and the failure to meet KPI 14 should not delay management changes to protect natural carbon assets, through reducing and ceasing logging activities. 5. DWER considers the use of the wetter historical rainfall record is inappropriate for predictive hydrological analysis and as an indicator for the future (see "Selection of future climate 	Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.

		<p>projections for Western Australia”).</p> <ol style="list-style-type: none"> 6. Adaptive responses to climate change should be developed together and reviewed under the guidance of a systematic framework for developing a climate adaptation planning responsethat considers the full range of climate risks, and therefore their respective priority. 7. The Commission should advise the Minister for Environment to commit the state government to a full review of all government statutory agreements, contracts and policies related to use and management of the south-west forest in light of climate change compounding land use pressure and threatening processes. 8. There is no ForestCheck program for Karri forest. 	
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Ref Number	Theme	Comment	Response
Productive capacity (KPIs 15 – 19)			
2, 21, 25, 33	KPI	<ol style="list-style-type: none"> 1. No follow up actions for KPI 17 even though rated as non-achievement. 2. No KPI to measure the value of new forest areas and their ecosystem function. 3. KPI 19 just looks at ability of Government to meet contract obligations – replace with a KPI that forecasts the sustainable level of pine sawlog production. 4. KPIs do not adequately address long-term nature of investment in the forest products sector (e.g. a new KPI indicating a rolling 30 year forecast of total pine sawlog availability from all sources). 5. 90% of the plantation losses to bushfire come from fires originating from outside of the plantation. It would be beneficial for investors' confidence to have a KPI that specifically reports upon the age of forest fuels adjacent to public and private plantations, and develops a staged plan to reduce the average fuel age over a short period of time. 	Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item.
3, 7, 20, 25, 33, 42, 44, 50, 55	Other bole volume	<ol style="list-style-type: none"> 1. Markets need to be found for low grade timber products for financial sustainability even if need be overseas. 2. Market conditions affecting opportunity to utilise products from timber harvesting 3. Industry requires long term security for investment and markets 4. There is no lack of markets for other bole volume. It is being blocked by a lack of political willpower by the WA government. 5. Making specific mention of markets, and explaining the holistic benefits of full utilisation of other bole volume, will improve social licence for industry and ultimately benefit forest health. 6. Alcoa is permitted to sell unprocessed bauxite sourced from high quality jarrah forest to overseas markets, whilst the FPC is unable or not permitted to sell low grade jarrah and marri log timber from the salvage harvesting of forest prior to the bauxite mining to overseas markets. 	Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.

		7. The biomass market for energy production already exists and a delay in the decision if other bole volume can be marketed as Biomass for Energy production has the potential to damage the market.	
6, 32, 46, 52	Cumulative impact of prescribed burning, logging and mining	<ol style="list-style-type: none"> 1. Impacting all aspects of current and potential future honey production areas (e.g. it takes more than 5 years for Marri tree from time of burn to recover for first flowering to product nectar). Consideration inadequate in current plan. 2. Clear-felling karri and intensive logging of jarrah forests has multiple negative impacts for water, climate, wildlife and industries other than logging (such as honey production). 	Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.
7, 16, 20, 22, 25, 32, 33, 42, 46, 55, 57	Plantations	<ol style="list-style-type: none"> 1. Action needed to reduce loss of plantation from fire and drought 2. Increase the area of both native forests and plantations. 3. Continued loss of plantation area will lead to significant and serious implications of area reductions into the future 4. Rogue radiata in State forests (i.e. weed?) 5. Introduce Canary Island Pine (<i>Pinus canariensis</i>) – adapted to fire, low rainfall requirement (>200mm p.a.) and Black Cockatoos eat the seeds 6. The ability to sustainably supply softwood production contracts depends on all areas of plantations (including sharehold and freehold) not just in the FMP area and should therefore be reported annually. 7. The Gnangara mound classification as a plantation needs to be updated reducing the plantation estate by 6300 ha 	Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.
7, 25	Bauxite mining	<ol style="list-style-type: none"> 1. Identify areas of high quality forest within bauxite mining leases covering the northern jarrah forest to seek exclusion of mining. 2. Give up trying to rehabilitate bauxite mined jarrah forest and have mining companies replant softwood plantations. 	Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.
32, 42	General	<ol style="list-style-type: none"> 1. Gap creation should be phased out as causing too much loss of structural resilience. 2. Compliance with biodiversity conservation guidelines, such as informal reserves and habitat trees, should be included in reporting on these KPIs. 3. Where applicable, the mid-term review should specify that the Department and the FPC should work collaboratively with industry 	Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.

		<p>4. Commission commentary regarding:</p> <ul style="list-style-type: none">a. KPI15 should be expanded to explain the impacts of loss of net area of forested land, in particular the loss of available State forest for timber production.b. KPI16 to explain why the FMP average allowable cut is practically unachievablec. KPI17 to explain the current barriers to timely thinning of regenerating native forest and integration of thinning with current operations.d. KPI19 to explain the impact on the declining plantation resource estate and predicted shortfalls.	
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Ref Number	Theme	Comment	Response
Heritage (KPI 20)			
7, 21, 24, 36, 46, 56	Traditional fire management knowledge and skills	1. Engagement of Noongar people to learn about and apply traditional fire management activities.	Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.

Ref Number	Theme	Comment	Response
Socio-economic benefits (KPIs 21 -23)			
6, 13, 16, 21, 24, 30, 49, 52, 56	Insufficient consideration of sustainable forest industries such as apiary and tourism	<ol style="list-style-type: none"> 1. The FMP does not adequately consider the socio-economic benefits of the apiary industry and tourism (e.g. honey and associated products value \$30 – 50 Million, pollination \$1.2 billion) 2. Potential to support more sustainable forest products such as carbon credits, honey, tourism, sport/recreation, seed collection, oxygen, rainfall and habitat. 3. Socio-economic losses that results from native forest logging, quantified in terms of carbon values and sustainable forest-based enterprises that lose access to forests after and during logging should be given full consideration in this section of the review. 4. Concern of degradation of natural areas from extensive bauxite mining impacting social values i.e. recreation and amenity 	<p>A number of submissions made reference to KPI 21 on the social and economic benefits of the timber industry and contend that the economic benefits of other forest produce like honey and the economics of co-existing forest uses such as recreation/tourism are not included in the relevant KPI.</p> <p>The primary objective of the review is the extent to which management of land to which the plan applies has been undertaken in accordance with the plan and KPI 21 reporting does not require equivalent reporting other forest produce including public firewood, burls, craftwood, wildflowers and seeds and honey.</p> <p>The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.</p>
12, 42, 46, 52	FMP does not consider benefits adequately	<ol style="list-style-type: none"> 1. No quantification of long term benefits of old growth forests rather focus on short-term economic benefits of timber products 2. Review should identify at least some of industry's contribution to society beyond employment. 3. Conflict between sectors erodes the 'social licence' – Commission needs to acknowledge the importance of risks in active forest management essential for forest ecosystem health. 4. Native forest timber harvesting's contribution to social and economic benefits is far less than that of plantation forestry (total value GRP of \$635M: \$104M native forests, \$274 softwood plantations, \$265M hardwood plantations) – the Commission should acknowledge that. 	
22, 23, 46	Regional processing facilities and value adding	<ol style="list-style-type: none"> 1. Foster regional processing and value adding 2. The proposed Integrated Timber Processing proposed by the FPC makes structural restoration of a healthy dominant canopy feasible, whilst continuing to produce sawn Jarrah timber 	<p>Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.</p>

22, 42, 46, 55	Short-term resource supply security	<ol style="list-style-type: none"> 1. Industry remains largely unsecured leading into the next [timber supply] contract period hampering much needed new investment 2. As harvest and haulage contracts are set to expire in 2023, companies are hesitating to invest and banks are hesitating to offer loans. 3. Suggesting that the next FMP be a rolling one with complex and thorough sustained yield calculations projecting many decades ahead, to 2070. 	Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.
40	Strategic Road Network	<ol style="list-style-type: none"> 1. FPC's reporting to DWER indicates that there has been a net decrease in road area (i.e. more road closures than new forestry access roads opening). The draft review should provide more details to highlight the benefits of these road network activities. 	Out of scope - noted.

Ref Number	Theme	Comment	Response
Plan implementation and management (KPI 24)			
2, 12, 28, 32, 38, 42, 49, 52	Adequacy of management system	<ol style="list-style-type: none"> 1. Concern raised that there are no performance targets set for three of the four KPIs (i.e. TECs, flora and fauna) – challenges adequacy of management system in place 2. Failure to provide relevant information through regional nature conservation plans or regional fire management plans 3. Process for carrying out mid-term review has been seriously hamstrung by a lack or paucity of data 4. The FMP itself must be considered the central element of the institutional framework and the reporting against the KPI is therefore misleading. 5. The FMP has failed to satisfy the CALM Act principle of achieving optimum yield in production by (i) restricting production to include only timber and pulp, and (ii) failing to undertake a comprehensive assessment of all possible forest product utilisation options in order to identify the optimal option. 6. Require a rolling FMP which will improve resource security for industry and allow for improved silvicultural outcomes for WA's forests. 7. Forest managers and contractors only have to 'have regard' to FMP guidelines – not legally binding 	<p>Some submissions highlighted an apparent inconsistency in the level of achievement attributed to KPI 24 (Extent to which the institutional framework supports the conservation and sustainable management of forests) or more particularly 24.1 <i>Guidance documents to be prepared and/or reviewed as required during the period of the plan</i>. The Commission has noted comments from the review submissions in relation to particular FMP supporting documents and procedures, such as the 'Procedure for the assessment, identification and demarcation of old-growth forest' and the Regional Nature Conservation Plans. Consistent with its assessment and auditing function the Commission has scheduled an assessment of the implementation of the <i>Procedure for the assessment, identification and demarcation of old-growth forest</i> for reporting by 31 January 2020.</p> <p>The Regional Nature Conservation Plans are currently under review by the Department. The Commission acknowledges that key information relating to the measurement of KPIs via the Nature Conservation Service Plans which explicitly reference KPIs 1-5 and KPI 8, was not readily available at the time of the review requiring consideration of relevant and appropriate surrogate measures. Although these surrogate measures did in many instances provide an indication of the status of the performance indicator, the lack of data made it difficult to draw conclusions with confidence. However, the relevant KPI protocol (below) stipulates that the required documents to satisfy this KPI are those listed in Appendix 5 of the FMP which does not include reference to the Regional Nature Conservation Service Plans.</p> <p>In reflecting on the intent of this KPI it is noted that the measures for this KPI are output based and provide limited information to determine management effectiveness. Alternate performance measures for this KPI will be considered for future planning.</p>

7, 52, 56	Scientific knowledge	<ol style="list-style-type: none"> 1. Limited output of published scientific papers on productive capacity, climate change and carbon cycles reflects limited scope of implementation. 2. Knowledge gained from forest management should be communicated to community members – there have been few if any key education awareness and extension programs for the public to attend. 	The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.
10, 24, 32	Independence	<ol style="list-style-type: none"> 1. Assessments should be independent of DBCA and FPC 2. Throughout value processing I would have liked to see more weight given to scientists who are focussed on complex ecological consequences of past practices and who have independent practices and guidance to offer. 3. Commission take carriage of the development of an integrated, properly resourced data collection and reporting system. 4. Commission to ensure that progress reports for KPIs not achieved that are reported annually be made public. 5. The Commission should make a recommendation that appropriate funding be provided so that WA's unique and threatened biodiversity can be conserved and protected. 	Noted. The Commission considers the current FMP management activities and review recommendations sufficient to cover the issues identified through the public submissions in relation to this item at this time.
23, 46	Forest Products Commission's Act	<ol style="list-style-type: none"> 1. Requires all wood contracts to be profitable – some activities such as mechanical fuel reduction activities may only break even at best. 2. The definition of forest products (s4) excludes any reference to carbon. 	Out of scope – noted.

APPENDIX A - Modified wording from 86 of the proforma submissions.

APPENDIX B - A summary of the 32 online responses to the questionnaire

Variations to proforma submissions from WA Forest Alliance to draft mid-term review of performance of FMP

ORIGINAL

Dear Mr Mau,

Please accept my submission on the draft mid-term implementation review of the Forest Management Plan 2014-2023 (FMP).

Our unique South West forests are being mismanaged with major negative impacts. The FMP should be amended to protect forests and their ecological values and functions.

The draft review has ignored substantial evidence that logging and burning are having major impacts on forests, wildlife, and biodiversity, and has rubber stamped business-as-usual practices.

It ignores calls from within Government agencies, and from the community, to protect High Conservation Value forests, and exposes a serious lack of scientific oversight in forest management.

The FMP should be amended to:

- Identify and protect all High Conservation Value forests from logging and clearing
- Fully protect threatened species and their habitats from threatening processes including logging, clearing, and inappropriate burning
- Establish and maintain forest health, wildlife, and biodiversity monitoring systems
- Incorporate up-to-date climate data
- Rule out any increases in the annual cut of timber from native forests
- Rule out the use of native forest logs for energy generation

Please use the current implementation review of the FMP to improve protection of the forests, and their wildlife and biodiversity.

Yours sincerely,

Table: Variations to original text

ID No.	Variation (text)	Comments
1	<p>I will use the same words that many others do, but that is because we are all united with our extreme concern at the lack of care or forward thinking in government departments where our native forests (and basically all of our natural environment) are concerned. Our unique South West forests are being mismanaged with major negative impacts. I KNOW, because I have lived here in the southwest my entire life, as have five generations of my family, and we have seen the devastation and degradation first hand. The FMP should be amended to protect forests and their ecological values and functions.</p> <p>... I note that every time there is any environmental impact study done, or even any focus, it is on one small area and concerns are dismissed. But we see the bigger picture, the whole history of destruction and the ongoing, ever increasing negative effects of forestry MISmanagement.</p>	No new information or evidence provided
2	<p>Our unique South West forests are being managed exceptionally well & The FMP protects forests and their ecological values and functions.</p> <p>The draft review has taken into account substantial evidence that logging and burning are well managed to protect wildlife, and biodiversity.</p> <p>Good management of our Forests is vital to ensuring our Regional Communities continue to provide valuable jobs & be vibrant places to live.</p> <p>The FMP should therefore not be amended to reduce resource available to Industry:</p> <p>Please use the current implementation review of the FMP to continue the excellent work of Industry in being world leaders in the management of the South West Forests, and their wildlife and biodiversity.</p>	Supportive of draft review
3	<p>logging for woodchips in the 21st century is a joke selective logging for furniture is fine but the rape of our forests is deplorable in 50 years theyll be looking back thinking we were mad burning of in spring is bloody ridiculous wildflowers every where baby wildlife all gets burnt soon if we have any forests left theyll be sterile take a look into the future and see what your doing it is not sustainable THANKS</p>	No new information or evidence provided
4	<p>Its just not good enough wjen we have critically endangered species on the brink of extinction. Its deplorable we arent doing all we can to conserve these species. Government endorsed recovery plans state that conservation of remaining habitat is critical for survival. We are missing a good opportunity for tourism \$\$ here.</p>	No new information or evidence provided
5	<p>Also, stop destroying the bloody environment. We've got one planet, eh?</p>	No new information or evidence provided

6	<p>The previous government has left the FMP in shambles. It is severely biased in respect to forest clearing, against environmental factors. We have seen large areas of native clear felled and a vast amount of prime timber made into wood chips. Western Australian forests have been reduced at an unacceptable rate and now need your protection...</p> <p>As a long time member of the Labor party, I have come to expect a more responsible attitude to conservation that with the previous government. Please do not disappoint you loyal members, or the public in general.</p>	No new information or evidence provided
7	<p>The FMP should be amended to protect forests, the native wildlife that rely on them (including many species/populations that are threatened with extinction), and the forests' many other vital ecological, monetary, tourism, aesthetic, recreation, quality of life, and image of Australia as "green", values and functions [emphasis added to highlight additional text]</p>	No new information or evidence provided
8	<p>Labor made verbal promises to the conservation movement before the 2017 election to immediately preserve High Conservation Value forest if it won the election and also to implement a transition out of native forest logging to a new farm forestry and plantations based industry and the new Labor State government has not done any of what it promised. It is clear that the State government is being influenced by political lobbying by vested interests in this case to maintain a failing status quo in the native forest logging sector and this is morally abhorrent.</p> <p>The State government is failing to protect important threatened species habitat in our native forests and this needs to change as a matter of urgency as outlined by a growing number of scientists who say we risk losing many currently threatened species in the next decade or so, if urgent action is not taken. The urgency is not politically motivated but is simple reality and is reinforced by a growing body of science around both our native forests and threatened species. The State government is failing badly in it's duty of care to WA's public, to protect our natural assets and this is criminally negligent in my opinion.</p>	No new information or evidence provided
9	<p>It is wrong to use our precious forests for wood chipping, firewood, charcoal, garden mulch etc and the suggestion ro burn it to produce energy is criminal.</p> <p>It is well known that forests support wildlife, assist water conservation, soil health, shade, fresh air, feelings of well being and counteract the obvious catastrophe of climate change. We must have more protection for forests in WA.</p>	No new information or evidence provided
10	<p>The FMP was written under the Barnett Government, and it ignored scientific advice and community concerns, and set logging levels far too high. It also allows for clear-felling and intensive logging of ancient karri and jarrah forests.</p> <p>The draft review, which has been released for public comment, offers a real opportunity to correct the problems left by the Barnett Government, and get forest and wildlife protection back on track.</p> <p>So far, the draft review is just a rubber stamp for increased logging at the expense of forests and wildlife.</p> <p>Carbon dating has shown that logs from trees between 400 and 600 years old are being trucked directly to woodchip and firewood processing plants.</p>	No new information or evidence provided

	Rare and critically important nesting hollows that only form in very old trees are being destroyed, threatening Black Cockatoos and other wildlife with extinction.	
11	<p>This is something I am bloody passionate about, and conserving our old growth, as well as our bushlands that have been raped(sic) over the last 100 years that are still being mismanaged and destroyed.</p> <p>If you are still reading, which I have my doubts of, I implore you to look into the current practices that are destroying our native bush for generations to come in a way that is economically reckless, when keeping these Forrest's for tourism dollars makes much more sense economically. Please look into the dollars that are currently wasted to harvest and sell wood chips, vs if it was managed correctly, and invested into tourist hotspots like look out trees, tree top walks etc.</p> <p>If I may, I'd like to give you a quick example using the tree top walk in Denmark, just one of many attractions in our southwest. That small patch of bush was developed at a total cost of \$1.8M in 2006.</p> <p>Big dollars you may say, between 2006 and 2015 it saw 3.2 million visitors, Paying and entry fee of \$21.00 each and \$13 per car to enter the park. Modestly assuming each car carried 4 people in it will bring the total profits from your little \$1.8M investment to \$77.6M just till 2015. That's not including the massive dollars the tourist shop there makes.</p> <p>People travel the world to see our south west trees, it just makes sense to invest in them with attractions, instead of chainsaws and bulldozers.</p>	No new information or evidence provided
12	<p>now is the time for real and true action for the future generations let us leave a legacy of bright beauty not greedy Tom foolery thankyou 🙏🙏🙏</p>	No new information or evidence provided
13	<p>Biomass is bonkers.</p> <p>I nearly choked on my coffee when I first heard about a proposed Biomass plant to be commissioned in Manjimup. Why are our native forests still being considered by the WA state owned Forests Products Commission (FPC), in this enlightened aged, that they are a renewable energy resource.</p> <p>The south west high conservation value forests are teeming with threatened flora and fauna endemic to the area, they are a complex fragile ecosystem supporting not just the living things and the land, but also the farmers that surround them. They are a valuable magnet and sponge for soaking up the dwindling rainfall to the area. They are our last defence against the effects of climate change and drought.</p> <p>This whole "biomass" - burning native trees for energy- is utterly non-sensical. In WA we already have coal, wind, solar, gas, huge, huge landfills, growing everyday Why on earth would we need to chop down a native forest for "energy" ? INSANE!</p>	No new information or evidence provided

	<p>The forest is a living thing. Perhaps the Forestry Industry has some things to learn from the fisheries dept. I mean, they don't go round killing the babies and juveniles as they know that'd wipe out the whole ecosystem in one generation. The same theory should be applied to those "low quality logs" that are being left in the ground.</p> <p>Unlike fisheries management practices however, large mature trees, and what's left of the old growth forests are more valuable being left alive.</p> <p>Given how vulnerable the forests are to climate change, cutting them down now would mean they'd pretty much never regrow to what they were.</p> <p>The slash and burn practices from the olden days are a dangrous and irresponsible practice that should be outlawed entirely.</p> <p>It's time to decommission the FPC! Our forests are worth more living.</p>	
14	<p>Our ancient forest need protection they are essential for our survival. I watch them being carted through Bridgetown everyday. Labour promised to protect our old growth forests and you not. These forest are essential in combating climate change. If you are serious about our environment you must do something now.</p>	No new information or evidence provided
15	<p>This should include forrests which are highly valued by local communities, like Barrabup forrest near Nannup.</p>	No new information or evidence provided
16	<p>I have lived in a country town most of my life and have seen so much forest and river systems damaged or destroyed through mining. we have lost so much and none of it has been replaced.</p>	No new information or evidence provided
17	<p>I have been a regular visitor to the South West forests for the past ten years, and I have seen with my own eyes the devastation being caused by current logging practices. In particular, the mono-culture being developed under the lie of "reforestation" is particularly damaging. No under story completely denies our ground dwellers the habit they need to live, thrive, and survive.</p>	No new information or evidence provided
18	<p>I am a West Australian who cares about and appreciates WA Forests. Please accept my submission here on the draft mid-term implementation review of the Forest Management Plan 2014-2023 (FMP).</p> <p>I am concerned as our unique South West WA forests are being mismanaged with major negative impacts. Your government is now in charge of this appalling situation and you have to opportunity to alter the train wreck that the Barnett government set in motion. The FMP should be altered to do what was initially proposed - protect forests and their ecological values and functions.</p> <p>The draft review is useless. It has ignored substantial scientific evidence that logging and burning are having major impacts on forests, wildlife, and biodiversity, and has rubber stamped business-as-usual practices.</p>	No new information or evidence provided

19	<p>The FMP cannot go forward without obvious and sustainable amendments to protect forests and their ecological values and functions.</p> <p>The draft review has blatantly ignored substantial evidence that logging and burning are having major negative impacts on forests, wildlife, and biodiversity, and has rubber stamped business-as-usual practices.</p> <p>How can future management plans ignores calls from within Government agencies, and from the community, to protect High Conservation Value forests, and exposes a serious lack of scientific oversight in forest management? Such calls cannot.</p>	No new information or evidence provided
20	<p>I am disgusted that WA's unique bio-diversity is being wiped out and at such an alarming rate. It shocks me that authorities are allowing this to continue and in such an underhand and clandestine way.</p>	No new information or evidence provided
21	<p>I'm a recently arrived in WA, and I am already astounded by the region's beauty, and ecological uniqueness -- in my short time here I have enjoyed walking in the jarrah forests and marvelling at the diversity of flora. However, I have also been surprised that in Australia, a nation I perceived to be strong in the field of landscape conservation, that the threat to internationally important habitats is so great.</p> <p>As both a non-Australian and as a scientist, I recognise the ecological significance of WA's native forests, and ask you to amend the 10 year Forest Management Plan. As a Biology undergraduate at Oxford University, we were presented with the example of Black Cockatoos and old-growth trees in south western Australian forests to illustrate the importance of understanding inter-species reliance and life-stage specific attributes in order to execute successful conservation programmes. It would be a shame for south western Australian forests to become an example of a lost habitat, or forest management failure.</p>	No new information or evidence provided
22	<p>You have the chance to preserve this unique part of the world for future generations and cement a positive legacy; I urge you, as a fellow West Australian, to do so.</p>	No new information or evidence provided
23	<p>We must remember that this forest is unique to this corner of the WORLD, not just to Australia. We have a global responsibility to maintain it for future generations of humans and the wildlife that lives within it.</p> <p>To log ancient trees for woodchip is highly reprehensible.</p>	No new information or evidence provided
24	<p>I have protested activity at the logging in the Mowen Forrest, b near where I live because it was done carelessly without thought for the habitat of wildlife, selection of oldgrowth jarrah while leaving millable saplings, not allowing for regrowth in under 100 years.FPC replied that they were following environmental requirements of the Federal government, but these regulations do not take into account the uniqueness and fragility of our South West forests.</p>	No new information or evidence provided
25	<p>What are we really doing to help prevent the rapid decline in numbats and many other wildlife that rely on these forests. Not to mention that really important thing that trees create - oxygen, and the way it has been proven that</p>	No new information or evidence provided

	trees play a significant part in preventing the onset of climate change. Why are we so intent on destroying these forests, and to add insult to injury turning so much of it into woodchips. This is environmental vandalism at its worst.	
26	I don't think anyone would be happy to be cutting down native forest for woodchips etc. They should be coming from plantations. I teach sustainability in HASS, how is this practice demonstrating sustainability to our young people? I believe more native forest needs to be protected for its aesthetic value, for its role in our ecosystem and in mitigating climate change, for protecting animal habitats, and because it is the right and smart thing to do.	No new information or evidence provided
27	The draft review has ignored substantial evidence that logging and burning are having major impacts on forests, wildlife, and biodiversity, and has rubber stamped business-as-usual practices that's are clearly unsustainable. The Draft ignores calls from within Government agencies, and from the community, to protect High Conservation Value forests, and exposes a serious lack of scientific oversight in forest management, which greatly trouble me. Is this due process or are vested interests exerting undue influence? Personally, I would favour only selective logging by smaller local operators, with an emphasis of the maintaining the ecological and biodiversity of all our forest habitats for all endemic life forms and reestablishing forest cover throughout to help sequester atmospheric carbon and help restore local climates and rainfall.	No new information or evidence provided
28	My family, friends and many other West Australians (PLUS all the tourists we are trying to attract!) want our Forests to remain intact, especially the old growth forests! We do not want them shredded for firewood and woodchips. This destroys a major tourist attraction! Our unique South West forests are clearly being mismanaged with major negative impacts on the state. Many Government Agencies are saying the same thing. The FMP should be amended to protect forests and their ecological values for the good of all.	No new information or evidence provided
29	In a recent report to the IPCC a group of 40 scientists conclude, "Our planet's future climate is inextricably tied to the future of its forests." "By protecting and restoring forests, the world would achieve 18% of the emissions mitigation needed by 2030 to avoid runaway climate change, the group of 40 scientists, spanning five countries, said in a statement." (Source: https://www.theguardian.com/environment/2018/oct/04/climate-change-deforestation-global-warming-report) Current native forest management regimes are depleting the carbon storage capacity of Australia's forests and relying on regrowth carbon stocks to neutralise carbon emissions n the sector. Scientists are warning that the planetary climate emergency requires we stop logging mature forests and end deforestation if human societies are to have any chance of halting catastrophic global warming by protecting the biodiversity of the living ecosystems that regulate life on earth. The WA government must heed the scientific evidence and end 'business-as-usual' forestry regimes.	No new information or evidence provided

30	<p>As a long term resident of Denmark WA, and a frequent visitor/user of our south coast forests (and the consultant who managed the last 10 year planning process for the Tree-Top-Walk, it is clear to me our unique forests are being mismanaged with major negative impacts.</p> <p>The FMP should be amended to actually protect forests and their ecological values and functions.</p> <p>The state's review of its native forest logging practices says critical knowledge gaps and faulty tracking of threatened species has made it impossible to complete its conservation task properly.</p> <p>Four KPIs relating to biodiversity – threatened fauna, threatened flora, threatened ecological communities and wetlands – reportedly have not been met.</p> <p>Also that the Department of Biodiversity Conservation and Attractions fails to provide the clear targets, standardised methods, and species management priorities that the forest management plan, and the review, had relied on.</p> <p>Carbon dating has shown that logs from trees between 400 and 600 years old are being trucked directly to woodchip and firewood processing plants. Rare and critically important nesting hollows that only form in very old trees are being destroyed, threatening Black Cockatoos and other wildlife with extinction. Please use the current implementation review of the FMP to improve protection of the forests, and their wildlife and biodiversity.</p>	No new information or evidence provided
31	<p>I live on a farm in the SouthWest of Western Australia which contains 50 acres of pristine natural bush. I am angry at FMPs exploitation of our natural resources in State forests, in particular the logging of mature trees, including jarrah and marri, which will take centuries to replace, We need our unique forests to protect our flora and fauna and preserve the balance of our ecosystem.</p>	No new information or evidence provided
32	<p>I am adding this section to a general submission</p> <p>Please reconsider this incredibly important issue of preserving our Forests- what little is left” and consider a FMP as exactly that- a fabulous centre of excellence in getting the best minds involved in the Health and Vitality of Forests- not EXPLOITING WASTEFULLY the last big trees for a maximum of 30% use - the rest as chip-</p> <p>We should be carefully thinning- leaving trees for decades to grow as they should- the large trees were able to send roots deeply down and let's remember</p> <p>Trees bring the water</p> <p>Forests for Life is a great concept— offering ideas for employment— redeploying people from desecration for small profit in comparison to the value of a Foresit would expand a buffer of green</p> <p>Instead of diminishing it</p> <p>Look at any map of Australia to see how little Forest there is</p> <p>PLEASE RECONSIDER YOUR PLANS - Remove PROFIT as your torch and replace it with HEALTHY MANAGEMENT FOR POSTERITY and our Grandchildren and in fact the planets survival</p>	No new information or evidence provided

	It is completely irresponsible to do any more reckless plundering of his magnificent eco system	
33	<p>For decades our Southwest forests have been mismanaged, with the FMP being just one more indignity they have been forced to suffer - inflicted by a government with no understanding of the importance of our unique forests, or care for the future. The FMP should be scrapped - but at the very least amended to protect forests and their ecological values and functions.</p> <p>The draft review has ignored substantial evidence that logging and burning continue to have enormous impacts on forests, wildlife and biodiversity, and seeks to rubber-stamp business-as-usual. It is a blighted, thoughtless, inexcusable sop to a dying industry and a section of a government department that really does need to be clear-felled for its backward, ignorant, mismanagement for the past 40 years.</p>	No new information or evidence provided
34	<p>The FMP should be amended to protect forests and their ecological values and functions, protect air quality, and protect the climate.</p> <p>Also ignored are the methane and black carbon emissions when firewood is burned in slow combustion heaters, resulting in damage to public health and increased global warming. A review by the New Scientist concluded that log-burning stoves are harming our health and speeding up global warming facebook.com/newscientist/videos/10155097669589589/</p> <p>Please therefor use the current implementation review of the FMP to improve protection of the forests, their wildlife and biodiversity, and also protect our planet by reducing CO2 and SLCP emissions.</p>	No new information or evidence provided
35	Our unique South West forests are being managed very well. Please keep up the great work. Please don't listen to the SW Forrest Alliance as they are a bunch of wankers that have too much time on their hands and have decided to fill it with as much drama possible to make their otherwise dull deficient lives feel worthwhile.	Supportive of draft mid-term review
36	<p>you are currently reviewing logging and burning practices under the 10 year Forest Management Plan (FMP).</p> <p>The FMP was written under the Barnett Government, and it ignored scientific advice and community concerns, and set logging levels far too high. It also allows for clear-felling and intensive logging of ancient karri and jarrah forests.</p> <p>Your review offers a real opportunity to correct the problems left by the Barnett Government, and get forest and wildlife protection back on track. It should not be just a rubber stamp for increased logging at the expense of forests and wildlife.</p> <p>Carbon dating has shown that logs from trees between 400 and 600 years old are being trucked directly to woodchip and firewood processing plants.</p> <p>Rare and critically important nesting hollows that only form in very old trees are being destroyed, threatening Black Cockatoos and other wildlife with extinction.</p>	No new information or evidence provided

37	<p>The FMP is not economically sustainable and it is also contributing massively to CO2 pollution and thus exacerbating climate change.</p> <p>it is a blueprint for ecosystem and economic collapse of much of the South West of WA.</p> <p>It is time to completely ban the logging and burning of native forests and switch to plantation timber product production and targeted fire protection of identified assets rather than the current blanket prescribed burning of native vegetation.</p>	No new information or evidence provided
38	<p>Our unique South West forests are being poorly managed with disastrous consequences and huge ecological impacts.</p> <p>The FMP should be amended to protect forests and their ecological values and functions, to meet the desires for protection as determined by the people. These forests are owned by the citizens, the State is required to manage the forests for the good of its citizens.</p> <p>The draft review has ignored substantial evidence and knowledge that logging and burning are having major impacts on forests, wildlife, and biodiversity. Current silvicultural business-as-usual practices must cease immediately.</p>	No new information or evidence provided
39	<p>My concerns are around the valuing and return from forests. Cut timber is not the only, nor the most valuable, of forest products. Forests have a clear and demonstrable effect on rainfall and climate change, with commensurate value in farming production. Less rain = less farm output = less food and less \$\$\$. Cut Jarrah is worth about \$300 per cubic tonne, as a once taken price. A tonne of Jarrah honey is worth up to 1000 times that of cut timber, and can be earned annually.</p> <p>On a rational economic basis, even ignoring all of the values of environment, and biodiversity (which of course have significant value), the current management of our forests fails, and fails catastrophically.</p>	No new information or evidence provided
40	<p>Our world-class SW forests are being mismanaged creating major negative impacts.</p>	No new information or evidence provided
41	<p>The unique, biodiverse forests of our South West need to be protected for future generations and tourism opportunities.</p> <p>Logging in old growth forest is unacceptable to the community on many fronts.</p> <p>Current logging practices destroy this highly valuable forest for little financial or product gain: other types of wood can easily be used.</p> <p>You are in a position to make positive change. Please consider a better alternative.</p>	No new information or evidence provided

42	<p>The loss of our forest is a sadness beyond acceptance. So much has gone my grandchildren will never experience what the real Australia is! I have been protesting and writing submissions for 35 years and still it is being ignored. To witness a clearfell coup is heartbreaking when you know the trees were centuries old and never to be seen again, but used as toilet paper!</p>	No new information or evidence provided
43	<p>The more I travel in our South West, the more I am aware that this unique and fragile ecosystem is a world wide treasure. I am very concerned that our unique South West forests are being mismanaged with major negative impacts.</p>	No new information or evidence provided
44	<p>It is my will as a citizen of Australia that the logging industries be disbanded and all workers be transitioned into new industries that support a sustainable future.</p> <p>Logging forests for wood chips has been proven to be a highly wasteful and costly industry. There is no point in keeping an industry functioning when there is no net benefit to the people of Australia.</p> <p>It has been proven that the tourism industry provides more jobs and income, and the tourism industry benefits greatly from old growth forests remaining intact.</p> <p>New technologies (such as renewable energy, solar, wind, hydroelectric, oil creation from hemp seed, gasification of coal emissions), and old technologies (such as hemp, cotton, and bamboo production for use in fabrics and paper creation), should replace the outdated practice of logging. Hemp should be grown Australia wide in order to offset any losses from the disbandment of the logging industry. The amount of jobs and growth that could be provided by the adoption of the mentioned industries and sustainable practices so far outweigh the benefits (where there are minimal to none) of the logging industry, that continuing the outdated practice of logging goes against all logic and common sense.</p>	No new information or evidence provided
45	<p>We were hoping that, under a new WA government, we'd see more responsible governance with recognition of the value of the environment, especially taking into regard the urgency of taking action in the face of climate change. Now the climate emergency, as so clearly demonstrated, calmly and scientifically, in the IPCC report released just last Monday.</p> <p>I am therefore very happy to put my name to the more comprehensive and informed submission by the WA Forrest Alliance and the Conservation Council of WA which follows. I do hope that you will consider this submission seriously and adapt your review and response to it, implementing sustainable and responsible action and policies.</p>	No new information or evidence provided
46	<p>The South West Forests of WA are unique, extraordinary and should not be logged. As we head into a period of unstable and unpredictable global warming we need to be planting trees, not removing timber that is hundreds of years old (and have been carbon storage for that period).</p> <p>Because I care deeply about the forestry practices of the whole country and believe old growth should now never be logged - nor recovering timber - we must only log plantation forests I am writint to ask that you please accept my submission on the draft mid-term implementation review of the Forest Management Plan 2014-2023 (FMP).</p>	No new information or evidence provided

47	<p>The international tourist is primarily from urban areas. Our forests are the closest thing to wilderness that they get to experience. This type of self drive tourism brings far greater revenue to the state than does woodchipping and charcoal.</p> <p>Do not throw away the future jobs in tourism for low grade timber industry jobs.</p> <p>Save the forest.</p>	No new information or evidence provided
48	<p>I took part in forest protests in the late 1980's that culminated in change to our forest management strategies in WA. During that time politicians became aware of the low value use that ancient trees were sacrificed for. In many parts of the World trees of this age and size are venerated. We appear to be slipping back into a "Third World" attitude with regards to our amazing forest heritage.</p> <p>I intend to spend my retired years re-kindling the emotion within the political debate with regards to our forest management. I give notice in this submission that a watering down of our forest management policies will encourage many people to do the same. We need more of the "Doctors for Forests" etc that we have seen previously in the political debate in our State. I write this letter in the hope that you come to decisions in the current review that removes your government and party from the political fallout if the new forest policy doesn't protect the values in our forests that we cherish.</p>	No new information or evidence provided
49	<p>Our forests are worth more dollars standing then when brought to the ground. Cease all logging ('management').</p>	No new information or evidence provided
50	<p>As a Halls Head WA resident for more than eight years I know that our unique South West forests are being mismanaged, with major negative impacts. The FMP should be amended to protect forests and their ecological values and functions.</p> <p>Our state, in particular, has a vast array of flora and fauna found wild nowhere else in the world. Indiscriminate logging and burning are threatening the extinction of these precious species. They have nowhere else to go.</p> <p>I thank you in advance for your close, proactive attention to this literally vital issue.</p>	No new information or evidence provided
51	<p>Having read through the copious pages of the FMP, it appears to me that it is not key performance indicators that we should be addressing but rather the overall management of our unique south west forests. Our forests need greater protection from logging and burning. The impacts of these two activities is leading to a loss of biodiversity and lack of protection for our wildlife.</p> <p>The community wants greater protection of High Conservation Value forests, and expects that all decisions are made in light of sound scientific evidence and advice.</p>	No new information or evidence provided

52	<p>Only nine per cent of WA hardwoods left! What a disgrace! And so many of them have been lopped in virtual secrecy.</p> <p>These precious trees are the closest things to historical treasures we have in this state. They house a multitude of rare and endangered creatures.</p> <p>Without these magnificent majestic trees, we are destined to be tedious and endless suburbia and why would tourists bother to visit in the future?</p> <p>They come to see and admire our unique flora and fauna.</p> <p>The argument that people may lose jobs doesn't wash with me. Uber meant cab drivers lost jobs, Airbnb disrupted hospitality, and I'm a freelance journalist: the internet meant magazines got skinnier and they used freelancers less so my income was cut. It's the way of the world.</p> <p>If less chopping trees down south means less work for some, so be it: we all must adapt. And as I said, tourism benefits when there's something attractive to see down south; namely, magnificent forest, hundreds of years old which should never be touched.</p> <p>I can't stress to you enough how much it means to me, as a proud West Australian, to know that our ancient forests, what's left of them, are preserved, along with the creatures they shelter.</p> <p>I also don't expect to be labelled 'zealous ignoramus' or something disparaging because I value and appreciate ancient hardwoods, and unique West Australian flora and fauna.</p>	No new information or evidence provided
53	I firmly believe and know for a fact that our South West forsesets have far more value if left intact and not logged.	No new information or evidence provided
54	The draft review also ignores the imperative that the current practice is costing WA money, that is - it is uneconomic.	No new information or evidence provided
55	<p>It's hard to believe that logging of native forests is still continuing in 2018.</p> <p>The native forests industry denies us all a valuable tourism resource, sanctuaries for unique WA wildlife, and an essential carbon store.</p> <p>It is indefensible that this government allows it to continue.</p> <p>The FMP should be amended to protect forests and their ecological values and functions by phasing this industry out with a generous exit package over the next 3 years.</p> <p>Particularly appalling is any suggestion that we should be burning wood from native forests for energy.</p>	No new information or evidence provided

56	<p>Please see our Forests as something to protect. For global warming. For the wildlife living within. For our cultural history. For our future generations.</p> <p>It's worth more than paper pulp or biomass fuel.</p>	No new information or evidence provided
57	<p>I know you have been receiving a large number of these emails, but please don't ignore their importance and sincerity. The forests of southwest Western Australia are extremely vital for so many unique populations of animals. People are always saying that this region is a biodiversity hotspot as though it is something we should be proud of, however they misunderstand it's true definition. Whilst it means we have a high number of endemic species, it also means that these species are highly vulnerable with already more that 70% of their habitat being lost.</p> <p>Hence, further land clearing in this region will result in increases in this vulnerability and may even cause the extinction of these unique species. Therefore, I implore you to please review your management strategies. Do you really want to be remembered in the future as the man who helped to pass legislation that failed to protect the southwest's unique and wonderful biodiversity when you had the opportunity to do something about it?</p>	No new information or evidence provided
58	<p>Logging and destruction of habitats impacts everyone, not just those living locally. We should be acting as a global village and preserving the little we have left.</p>	No new information or evidence provided
59	<p>It takes hundreds of years for a tree to grow and minutes to cut it down. Many endangered animals rely on those trees for their homes. We have cleared so much forest already for farming there is hardly any left. It is vitally important to protect the remaining forest not only for the animals that call it home but for our children's future.</p>	No new information or evidence provided
60	<p>The draft review has ignored substantial evidence that logging and burning are having major impacts on forests, wildlife, and biodiversity, and has rubber stamped business-as-usual practices. This is no time for business as usual - not according to the IPCC (an UN body) anyway. People are scared for the future. We literally cannot afford to lose more forests.</p>	No new information or evidence provided
61	<p>I spent the past month in the SW forests for a Murdoch Uni ecology camp. We looked at the effects of disturbance. What we discovered, the effect disturbance (logging and fire) takes a longer time than expected for the bush to recover. Fires are happening more frequently (due to global warming) with less time for the bush to recover than in it had previous years. Trees had less seeds, meaning the forests are changing due to climate change. The sites effected by logging approx. 100 years ago had still not fully recovered. The Jarrah and Karri forests are such fragile ecosystems, they really should not be altered, or else its lost. its like a downward spiral, it reduces riparean zones, whilst raising the water table, this effects the water ways and the flora and fauna that interact with it (fish birds, animals, plants). Please use common sense, think of the bigger picture and understand forests are far more important than jobs and growth. Thanks.</p>	No new information or evidence provided
62	<p>The people of Western Australia made their views clear during the late ninties that they wanted the old growth forests saved. There was a huge movement to save these precious forests that included eighty percent of the population of this state. Myself and many many others worked hard to ensure that this resource was protected from</p>	No new information or evidence provided

	<p>the wasteful ravages of the forest industry who were clear felling ancient trees for woodchipping, with no thought for the future, no plans for the future, no chance of sustainability.</p> <p>Now I find that we are back to the same place but with a Labor government ignoring the real views of the people of this state who hold our old forests in high regard as a legacy for our future.</p> <p>Somehow, the public servants have perverted the agreements made during the extended process which resulted in the RFA and through sophistry and manipulation changed the definition of what constitutes an old growth forest.</p> <p>It is a careless and self seeking move to support a logging industry that is totally unsustainable. It has been nearly twenty years since the logging of old growth forest was stopped and they are still expanding their demands for old growth forests to clear fell for woodchipping. It is an industry that employs few people yet destroys the livelihood of many. Apiarists for one and the many industries which have developed based on tourism over the last two decades.</p> <p>I now live in Bridgetown and have been devastated to see, in the last year, logging trucks clearly marked plantation timber sneaking through in the early hours of the morning loaded with old growth karri. So large that there are only eight logs fitted onto the truck.</p> <p>This is not what was agreed to in the RFA. The change in definition of old growth is in my view completely irrational and panders to an industry which benefited hugely from handouts when logging was curtailed and yet is back again destroying these beautiful forests.</p> <p>Following is pasted the well written response to the draft review put together by the WA Forest Alliance and the Conservation Council of WA.</p> <p>I totally agree with their response that the scientific advice and community concerns have been ignored in regards to logging our south west forests.</p>	
63	<p>I took my husband back to WA from interstate to see the forests around the Nornalup area that I spent many holidays in as a child in the 60's and 70's and wept because the canopy you couldn't see sky through has been reduced to a pathetic strip of trees on either side of the road. Shame on this state for destroying a natural asset that belongs to all the people, not just financial interests. Countries all over the world have woken up. What is wrong with us that we can't see how precious this natural asset is?</p>	No new information or evidence provided
64	<p>I no longer live in WA, but grew up visiting and loving these forests. As a vegetation ecologist of over 20 years experience I now appreciate their value even more.</p>	No new information or evidence provided
65	<p>It is my belief that our unique South West forests are being mismanaged with major negative impacts.</p> <p>These recommendations [from the Wafa submission] make perfect sense. I am sure you can see that! We must take a long term view that values this wonderful resource for which we have a responsibility to protect for future generations. To not do so is criminal and ludicrous.</p>	No new information or evidence provided

66	<p>We need to take care of these forests and don't look back and realise that an irreversible mistake was made.</p> <p>With the planet in the state it is in we need to do everything we can to protect the forests.</p>	No new information or evidence provided
67	<p>I urge you to amend the FMP. To place the highest priority on protecting and managing WA forests for their biological and ecosystem function values.</p> <p>Our children need forests not woodchips.</p> <p>Please correct the business as usual FMP established by the previous government who were unable to see that forests are more valuable than the few jobs the publicly subsidised woodchipping industry.</p>	No new information or evidence provided
68	<p>Our unique South West forests are being mismanaged with major negative impacts. I find this highly unsatisfactory. The FMP should be amended to protect forests and their ecological values and functions</p>	No new information or evidence provided
69	<p>I love our forests and the wildlife that lives in it. It's so incredibly unique and absolutely necessary for human health.</p>	No new information or evidence provided
70	<p>I moved to WA 20 years ago and the forests of the SW were s big part of the draw. MANY more people value these forests for their beauty and ecology than you imagine. THEY ARE A HUGE TOURIST AND BIODIVERSITY ASSET, NOT TOILET PAPER.</p>	No new information or evidence provided
71	<p>Maintaining forests helps to promote rainfall - an important consideration for all people, many businesses and nature in our drying climate.</p>	No new information or evidence provided
72	<p>Our unique and rapidly diminishing South West forests are being mismanaged with major negative impacts to agriculture, businesses and rural and regional communities. The FMP should be amended to protect forests and their ecological values and functions thus extending and facilitating economic growth of regional areas across a range of industries.</p> <p>The draft review has ignored substantial evidence that logging and burning are having major impacts on forests, wildlife, and biodiversity, and has rubber stamped business-as-usual practices. Further it would appear to have totally ignored substantive scientific research on the wide spread impact on soil health, water quality along with pollinator availability, of continuous decline in volume & biodiversity of forest and bushland.</p> <p>It ignores calls from within Government agencies, and from the community, to protect High Conservation Value forests, and exposes a serious lack of scientific oversight in forest management.</p> <p>It also totally ignores the financial and social (long term costs) of maintaining and protecting natural bush diversity and growing the same.</p>	No new information or evidence provided

	<p>Without diverse and extensive natural systems soil health and water quality rapidly diminish. Agriculture and food security are significantly impacted.</p> <p>Please use the current implementation review of the FMP to improve protection of the forests, their wildlife and biodiversity and so enhance food security and regional health now and into the future.</p>	
73	<p>Our old growth forests have much more value standing than being cut down.</p> <p>Climate and rainfall: It has been proven that forest is critical to rainfall. Rainfall has significantly decreased as logging has removed forest cover from the SW of WA. Planting forests should be the priority. Where forests are restored, rainfall increases again, and more arable activities can again take place.</p> <p>Soils and salinity: The removal of trees changes the water table, allowing salts to come to the surface where they inhibit the growth of other plant life. The temperature on the surface of the soil, and light reflected to the atmosphere increase when trees are removed, increasing surrounding temperatures and adversely impacting the local climate. The soil microbiome is responsible for a lot more carbon sequestration than has been understood until recently. Exposing the microbiological agents doing this work to the sun and to the elements releases even more greenhouse gasses into the atmosphere. We should be doing everything possible to keep what carbon is already sequestered and to increase that sequestration, not to increase the release and destruction of the very things that are helping. This increase the problem!</p> <p>Habitat for native fauna, the trees are a significant part of the habitat for one of the most rich hot spot of species diversity remaining on the planet. Species diversity is not only a significant factor for ecology, but also for tourism.</p> <p>I maintain that any logging which is allowed should become selective, taking only individual trees, for specific high value tasks. Wood for furniture and high value is one thing, But cutting down ancient trees just to make them into woodchips is an insult and not acceptable.</p>	No new information or evidence provided
74	<p>Our unique South West forests are far more important for their ecological, tourism and amenity value than as a cheap source of timber, woodchips and firewood.</p> <p>The draft review has rubber stamped business-as-usual practices which continue to degrade the quality of our small and valuable remaining area of native forests.</p> <p>It is disturbing that we are harvesting resources that are hundreds of years old, while cutting 0.8% of Jarrah forests and 1.1% of Karri forests annually as outlined in the plan will result in our native forests never having the opportunity to regrow to the same level of maturity in the future.</p> <p>It is also disappointing to see that bole wood harvest use for low value use is significantly higher than high grade resource use, thus the majority of the harvest is being used for much less economically valuable and sustainable uses such as firewood and wood chips.</p>	No new information or evidence provided

75	<p>Since European settlement, the clearing of native vegetation is a significant threat to biodiversity with only 7% of the original vegetation intact, and the remaining vegetation scattered in fragmented remnants of varying sizes, condition and degree of isolation. Any landsat images of Southwest Australia shows the massive clearing of native vegetation across significant parts of the South West Ecoregion. Extensive tracts of vegetation are now largely restricted to the pastoral zone and the forested deep southwest which the West Australian Government is continuing to log. Fragmentation from logging practices results in the isolation of remnants from each other and affects the ability of native animals and plants to disperse across landscapes. This is particularly problematic for fauna which are unable to move across cleared landscapes..</p> <p>Globally a tiny fraction of intact remnants of habitats remain on Earth—just 2.3% of the earth’s surface—and are home to more than half of the planet’s living species. These areas are also among those that are most threatened. These are the global biodiversity ‘hotspots’: the richest reservoirs of plant and animal life on Earth. To qualify as a hotspot, a region must meet two strict criteria: it must contain at least 1,500 species of vascular (higher order) plants (> 0.5% of the world’s total) as endemics, and it has to have lost at least 70% of its original habitat.</p> <p>Putting that into context, the Southwest Australia Ecoregion is one of the planet’s major biodiversity hotspots. This recognition of global significance is based on high levels of natural diversity, particularly for plants and amphibians, together with high levels of threat to that diversity.</p> <p>Further, the Southwest Australia Ecoregion is one of 34 global biodiversity hotspots recognised by Conservation International. It is Australia’s only global hotspot, recognised worldwide for its wealth of natural diversity, particularly in plants, and the high degree of threat to this important natural resource. Our South West Forests are a significant part of the planet’s natural heritage, and the conservation of the biodiversity of this globally significant area is the responsibility of ALL Australians.</p> <p>The Ecoregion may also be described as an ecoregion complex with a number of distinct bioregions within its boundaries. In 2006 WWF, the conservation organisation, identified a set of global conservation priorities—the Global 200 Ecoregions—whose conservation across the globe would achieve the goal of saving a broad diversity of the Earth’s ecosystems. These ecoregions include those with exceptional levels of biodiversity, such as high species richness or endemism, or those with unusual ecological or evolutionary phenomena. Two of these global ecoregions are located in Southwest Australia: the terrestrial Southwest Australia Forests and Scrub Ecoregion and the freshwater Southwest Australia Rivers and Streams Ecoregion.</p> <p>In 2002, the Western Australian Salinity Task Force Report (2002) recognised the need for ‘an agreed vision for future landscapes ... that recognises the richness and vulnerability of biodiversity, the threat of salinity and climate change’ and ‘a tangible long-term vision for the landscape of the South West of Western Australia with an estimate of the budget needed to achieve it’.</p> <p>The Southwest Australia Ecoregion is also a Centre of Plant Diversity. Centres of Plant Diversity are areas defined by WWF and the International Union for Conservation of Nature and Natural Resources (IUCN) as places particularly rich in plant life. If protected, Centres of Plant Diversity that should be safeguarded as it houses most of Earth’s plant diversity. Twelve bird species are also endemic to the Ecoregion and it is thus recognised by Birdlife</p>	No new information or evidence provided
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	<p>International as one of the globe's 218 Endemic Bird Areas, areas defined as containing two or more of the world's restricted range bird species.</p> <p>The Ecoregion is comprised of the Southwest Botanical Province identified by Beard in 1980, together with an area of semi-arid gradation (the Transitional Zone) to the arid zone. The Transitional Zone represents an extension of Beard's Southwestern Interzone. Boundaries of the Transitional Zone have been determined by the inclusion of three biogeographic regions—the Yalgoo, Coolgardie and Hampton biogeographic regions.</p> <p>Key underlying causes for biodiversity loss and decline of other natural resources almost a decade ago was the continued clearing; lack of resources and incentives for conservation, and a lack of a visionary action plan for a comprehensive conservation strategy for the whole Ecoregion. Many of the endemic species of the Ecoregion are threatened, giving Southwest Australia the highest concentration of rare and endangered species on the continent.</p> <p>And yet our unique South West forests are being mismanaged with major negative impacts</p>	
76	As someone who has lived in the southwest for the last 20 years it horrifies me to see the continued destruction of our now dwindling native forests, the undermining of our ecosystems and the effect that has on salinity, native flora and fauna is being threatened by loss of habitat, fish stocks are dropping as well as our unique biodiversity.	No new information or evidence provided
77	Our unique and beautiful South West forests are being mismanaged with major negative impacts to our environment, our tourism and our flora and fauna.	No new information or evidence provided
78	For more than 40 years I have been waiting for a government to make the right decisions about our forests. I hope I won't have to wait much longer.	No new information or evidence provided
79	<p>The FMP should be amended to:</p> <p>-</p> <p>- look at managing the forests to produce other income streams not reliant on clearing eg. manage high conservation value forests as reserves to increase tourism, provide jobs for rangers and forest managers, tourism operators. And increase native timber plantations</p>	No new information or evidence provided
80	My husband and I have just owner built a small eco-home in old Yanchep and used red cedar for the windows and door frames because they fade to grey (like the hair on people if you live long enough) and don't warp with age (unlike most humans). Sadly though, the Black Cockatoo likes our red cedar - they're pulling strips off the frames and I've been wondering - is this their revenge on humans for being so careless with their habitat? It's a bummer that they're eating our home though - we've tried to do the right thing!	No new information or evidence provided

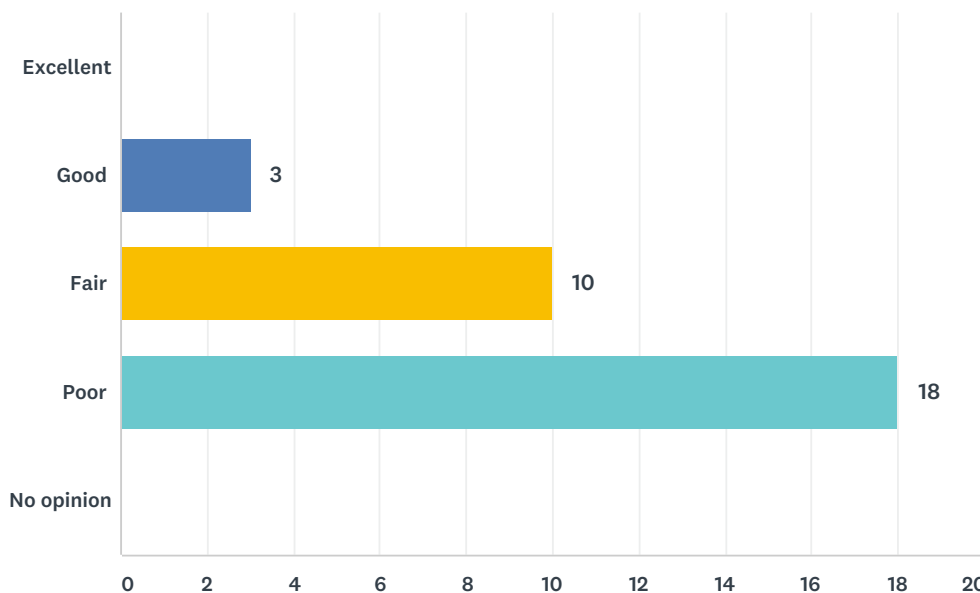
	If you have a remedy for this - other than protecting the habitat of the Black Cockatoo I'd love to know. In the meantime, please use the current implementation review of the FMP to improve protection of the forests, and the rest of the wildlife and biodiversity.	
81	South West forests are not being mismanaged and the FMP should not be amended	Supportive of mid-term review
82	I am a commercial bee keeper. I live just outside of Pemberton, surrounded by beautiful karri forest. Less than 500m from my door step is a recently logged karri coupe. The amount of wasted resource that is burnt up is unacceptable. 'Shelter belts' left between these coupes are inadequate and highly susceptible to damage from storms and high winds (i would be happy to show you a trail of large karri trees in these belts blown over). Further to this I have apiary sites that are now useless to me because of burn offs that are simply not needed. It is with sincerest concern around management of our south west forests, that I ask you to please accept my submission on the draft mid-term implementation review of the Forest Management Plan 2014-2023 (FMP).	No new information or evidence provided
83	The FMP should be amended to protect forests and their ecological values and functions. Please don't waist your chance to really protect what little there is left. I was born in Perth and sadly every trip I do through the South West reveales more cleared land and less forest. It is so sad to see such destruction.	No new information or evidence provided
84	What is going on? The Labor Party years ago promised to protect old growth forest. I thought that was enshrined in law. If you are felling trees for the practice of producing woodchips, no tree over 100 years old should be used for that low value activity. Please ensure that old growth trees are left. Over 90% of them have already been cut down.	No new information or evidence provided
85	Please accept my submission on the draft mid-term implementation review of the Forest Management Plan 2014-2023 (FMP). In 2002, I walked the Bibbulman track through the karri & jarrah forests of the south west & was astounded by their beauty, unique biodiversity, cultural & ecotourism value.	No new information or evidence provided
86	Once we have destroyed our beautiful natural places we will loose our endemic flora and fauna. Australia has the fastest extinction rate of any country in the world. This is outrageous for a wealthy educated country. It has taken the history of our planet to evolve these species that live only in our forests.	No new information or evidence provided

Note: Three submissions were supportive of the draft mid-term review of performance of the FMP and the remaining submissions expressed opinions against logging of native forests.

MID-TERM PERFORMANCE REVIEW OF THE FOREST MANAGEMENT PLAN 2014-2023

Q1 Overall, how would you rate the progress in the implementation of management plan actions? Also refer to Appendix 1 for Management Activities Report Card.

Answered: 31 Skipped: 1



#	PLEASE PROVIDE MORE DETAIL ON YOUR RESPONSE HERE:	DATE
1	Please refer to full text of WAFA submission	10/22/2018 1:07 AM
2	Some of the ratings for management are very optimistic and cannot be established without robust biological surveys being used to drive management (survey kpis are low). Weed and pest control and protection and enhancement of resistant species comes second to burning things.	10/19/2018 4:45 PM
3	But perhaps some of the plans are best not implemented?	10/19/2018 3:47 PM
4	The xxxxxx xxxx in WA is grateful for the diligent and sustained efforts of the Western Australian Government and its relevant departments and commissions in managing the South West forests. We give thanks for the work done to assess and protect the forests and the species within them against the threats of climate change, pests, diseases and weeds. We also acknowledge the important role of plantation timber management and encourage the development of the Softwood Industry Strategy. However, we still have significant concerns, as evidenced in a recently passed WA Synod Resolution: https://unitingchurchwa-startdigital.netdna-ssl.com/wp-content/uploads/2018/08/Proposal-5-Social-Justice-Commission_Protecting-our-forests.pdf	10/19/2018 3:10 PM
5	The report contains a lot of status updates which are very worrisome, like the decline in vegetation and vegetation health, the drought, the failure to protect vulnerable species of flora and fauna - yet there seems to be no sense of urgency, there is very little resolution to look for expertise outside of its own organization, and finally there is no recognition of how special the forests are that the Commission is supposed to look after.	10/19/2018 2:50 PM
6	We are living in a biodiversity hot spot and I'm not happy with the "fox looking out for the chickens". Government should be providing more resources to preserve our amazing flora and fauna while encouraging and supporting alternative wood sources and industries that support the local economy.	10/19/2018 2:11 PM
7	My overall concern is climate change & our inadequate response to its challenges to global & local climate. South-West WA is very vulnerable to its impacts & in a significant part I believe shortcomings in environmental management here are contributing dangerously to this situation. The FMP has huge responsibilities to get our response to climate change right. I am very uneasy that that is not the case although I am sure there are some good people within the forestry industry who are trying to improve processes and practice in the way we manage our forests an woodlands.	10/19/2018 1:48 PM

MID-TERM PERFORMANCE REVIEW OF THE FOREST MANAGEMENT PLAN 2014-2023

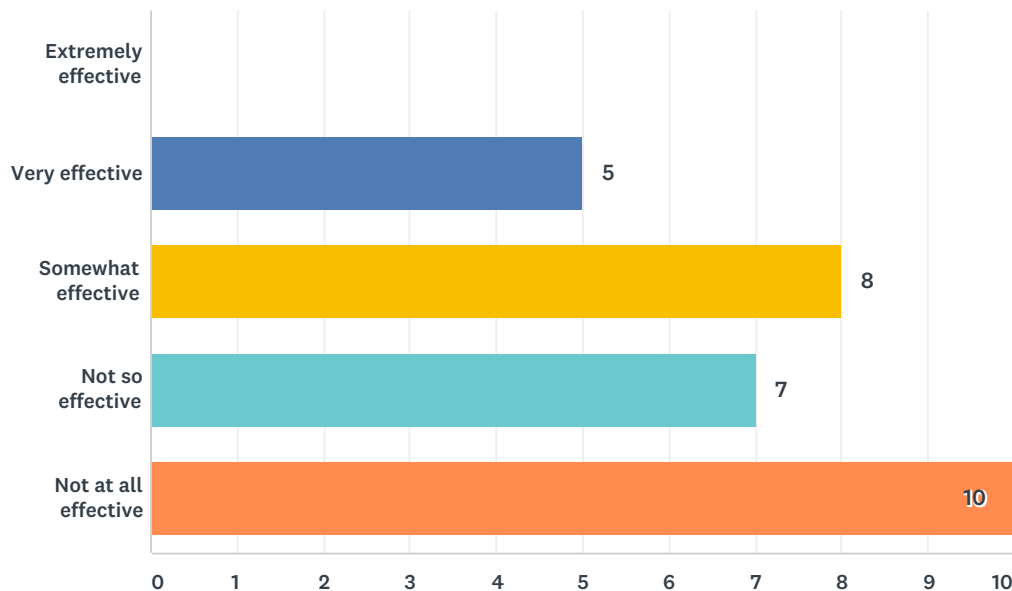
8	<p>Management of the forests has focussed on logging, clearing and burning for maximum output of timber, and with no regard to conservation as per requirements under ESFM. There are four Key Performance Indicators in the FMP that relate to biological diversity (FMP, pp44- 45). They consider forest health, Threatened Ecological Communities, threatened fauna and threatened flora. There are no performance targets set in the FMP for three of the four KPIs concerned with biological diversity (TECs, threatened flora and fauna). Instead, these KPIs refer to performance targets supposedly set in the relevant Regional Nature Conservation Plans (RNCPs). However there are no performance targets in the RNCPs that that can be used to measure achievement of the FMP's KPIs. The result is that there is no measuring system in place "...information was not readily available...and...although...surrogate measures did in many instances provide some indication of the status of the performance indicator, it made it difficult to draw conclusions with confidence" (draft review, p71) While the RNCPs don't offer specific performance targets for the FMP's biological diversity KPIs, they do provide other critical information and strategic action plans that have not been factored into the draft review. The main RNCPs for the FMP area are the Swan, South West and Warren. The current RNCPs were written in 2015 and describe a situation in which there are insufficient data, information, knowledgeable staff and monitoring and that teams are not able to provide adequate advice to FPC in order to implement the management of conservation within forestry activities. The 3 RNCPs all strongly recommend additions to the conservation reserve system and the assessment of HCV areas for protection. With so much emphasis on prescribed burning and facilitating access for the timber industry, and so little funding for and prioritisation of science and on-ground activities to conserve forests and biodiversity, there are critical knowledge gaps regarding threatened species and ecological communities and an inability to plan for recovery and protection (Swan RNCP, pp29-35). Unacceptably high numbers of threatened flora, fauna and ecological communities are in decline or are too poorly understood for the regional teams to be able to conclude whether their condition is improving or declining. In the Swan Region at the time of the RNCP being written, 42% of threatened fauna were declining and for 40% the trend was unknown; for threatened flora 22% were declining and for 27% the trend was unknown (Swan RNCP, p22 and p21). It's impossible for the FMP to continue to meet its management plan actions of timber output AND conservation outcomes. The two outcomes are in direct competition with each other.</p>	10/19/2018 1:39 PM
9	<p>The FMP is still green flagging the logging of Karri forests of high conservation value. Western Australians are watching closely and are increasingly fed up.</p>	10/19/2018 1:30 PM
10	<p>The performance against KPI, as reported, are generally attributed to a lack of resources and lack of capacity. Given the fundamental importance of the FMP, particularly for regional economic development through industry investment and activity, this is disappointing.</p>	10/19/2018 10:01 AM
11	<p>Poorly defined KPIs, lacking supporting data from Draft Regional Conservation Plans which is needed for management, and evaluation. Recommendations and management response are deficient in recognising the needs of management of the forest.</p>	10/19/2018 9:36 AM
12	<p>Trees are being demolished at a wrapped rate. Ego systems are being demolished without thought that they are home for birds and animals. Also our precious native flowers need preservation of places to grow in their native environments.</p>	10/19/2018 2:18 AM
13	<p>Seriously overlooked important considerations of climate change, carbon storage, biodiversity and the valuing of native forests, beyond purely consumptive uses.</p>	10/19/2018 12:53 AM
14	<p>Please see attached document for further detail</p>	10/18/2018 11:46 PM
15	<p>Fails to properly value all forest products - cut timber is just one - oxygen, rainfall, habitat, biodiversity, honey (worth up to 1000 times per tonne copared to cut timber, and it is repeatable year on year) to name just some...</p>	10/18/2018 10:34 PM
16	<p>A lot of the monitoring and scientific analysis seems to either not be carried out or is poorly done, the recommendations are (reading between the lines) therefore that more research is needed or better measures are needed.</p>	10/18/2018 12:59 PM
17	<p>Management Activities Report Card may have been helpful to negotiate this incredibly verbose document, but cannot relate the the numbers used. in an age where Global Warming is the greatest threat to 'business as usual', it is very disappointing that KPI 14 was a 'fail', ie. action deferred to next review. For an industry where it take 10 years to develop a marketable product, every month you fail to establish the potentially greatest value for the product is money & opportunity wasted.</p>	10/16/2018 10:38 AM

MID-TERM PERFORMANCE REVIEW OF THE FOREST MANAGEMENT PLAN 2014-2023

18	Implementation of actions identified in the plan has been variable, which is not unexpected given the variety of factors potentially affecting the ability of the Department (DBCA) and the Forest Products Commission (FPC) to undertake works on the ground, and that the plan has been in operation for less than five years. Overall, the Institute of Foresters has formed the view that Government and its agencies have not committed the resources necessary for proper implementation and monitoring of the plan, and that forest management has been accorded a lower priority than is warranted. The large decline in funding appropriation and staff resources since 2014 is a major concern, and if not addressed seriously in the near future will inevitably lead to serious shortfalls in achievement at the end of plan review.	10/15/2018 6:43 PM
19	The forests of the south west are under extreme duress from climate change, disease and worst of all mismanagement, there needs to be a moratorium put on all logging, burning and clearing until the science is clear that resumption of these activities will not have a long term negative impact.	10/9/2018 1:26 PM
20	Western Australia is losing species and habitat at a totally appalling and unacceptable rate and scale.	10/7/2018 7:10 AM
21	The report states: "it should be noted that 62 per cent of the area covered by the FMP is in conservation reserves or protected areas within which active management by thinning is not supported under the plan." As a person who has walked through large sections of the conservation estate in the southern park of the forested south west, I believe that large areas of forested land logged prior to the era when modern silvicultural management practices were applied are densely overgrown with 1000+ stems per hectare. This has serious biodiversity implications for the conservation/environmental values of those parts of the conservation estate and that thinning as a tool to protect and enhance biodiversity is critically needed throughout many/most conservation reserves and national parks. NOTE: the attached photo is just one of many I could provide of over-dense forested sections of the conservation estate which desperately require thinning.	10/6/2018 9:13 PM
22	Current harvesting operations on State forest seem to be well managed, but it is disappointing to note that there has been no progress on catchment thinning. It is vitally important that our regrowth forests are silviculturally treated (ie thinned) to increase water runoff into dams, to improve and sustain forest health in a drying climate, and to maintain forest wood productivity.	10/2/2018 4:10 PM
23	Unacceptably high numbers of threatened flora, fauna and ecological communities are in decline or are too poorly understood for to be able to conclude whether their condition is improving or declining. In the Swan Region 42% of threatened fauna were declining and for 40% the trend was unknown; for threatened flora 22% were declining and for 27% the trend was unknown (Swan RNCP, p22 and p21). This would suggest that the forest is not being managed properly for long term sustainability.	9/23/2018 5:18 PM
24	In areas being logged the damage done with big machines and trucks etc, then to close off those tracks to block access for people collecting firewood is very poor practice. As most people are happy to clean up a lot of good firewood that is left on the ground only to be burnt in a controlled burn ????. How does that make any sense.	9/14/2018 1:47 PM

Q2 Overall, how would you rate the reporting on the key performance indicators to inform the evaluation of the effectiveness of forest management activities?

Answered: 30 Skipped: 2



#	PLEASE PROVIDE MORE DETAIL ON YOUR RESPONSE HERE:	DATE
1	Please refer to full text of WAFA submission	10/22/2018 1:07 AM
2	The key performance indicators as set in the FMP itself were too narrow and limited in scope, such that the impacts of expanding and accelerated bauxite mining are entirely ignored (while also not being separately transparently addressed under the State Agreements with the miners).	10/22/2018 12:01 AM
3	The KPIs simply do not reflect the reality on the ground. Ancient trees continue to be logged and the changing criteria to "old growth" cannot hide this. Management of resources is inadequate and too focussed on prescribed burning. There needs to be a greater focus on forest health, wildlife, and biodiversity monitoring systems, beginning with baseline surveys.	10/19/2018 4:48 PM
4	I agree with the response to Recommendation 1 that there is a need to review and revise management practices to see what can be done in relation to climate change rather than just accepting that nothing can be done. It may be appropriate to work with universities and relevant community groups to come up with ideas. As regards Recommendation 5 and others similar, it may be that efforts need to be concentrated on conserving sufficient habitat of various types that effectively benefit all species and communities. Thus, we may need a minimum area of habitat not burnt less than 35 years ago and this may require special treatment of pests and diseases in these locations. As regards Recommendations 6 and 7, it is vital that the commission has at least sufficient information for assessment. The response to Recommendation 8 implies that there is over-representation of moderate fuel ages whereas that would appear to be a minor issue. Further, it gives some insurance to the future possibility of more forest in the over 35-year category, for which there appears to be a very big issue. Further, perhaps there needs to be many areas with a local-scale mosaic, as well as at the landscape-scale, for the benefit of flora and especially fauna? Do we need a mosaic of autumn and spring burns as well? As regards	10/19/2018 4:36 PM
5	Frustrating that budget cuts have limited information available to the Commission.	10/19/2018 4:16 PM
6	Please see my previous answer	10/19/2018 2:51 PM
7	The results are poor and I question how these KPI's are measured. Self regulation and assessment is not acceptable when we're look at such a valuable natural resource that belongs not only to all Australians but the world.	10/19/2018 2:12 PM

MID-TERM PERFORMANCE REVIEW OF THE FOREST MANAGEMENT PLAN 2014-2023

8	The targets for the KPIs seem worthy and some are reported to be met in part. There are clearly problems in meeting all. Throughout evaluation processing, I would have liked to see more weight given to scientists who are focussed on complex ecological consequences of past practices and who have independent perspectives and guidance to offer. I am very sad that Federal and State financing of managing WA's environment has shrunk over past years. I would think that has not helped the delivery of comprehensive & independent assessment of KPIs of forest management.	10/19/2018 2:00 PM
9	as mentioned above: There are four Key Performance Indicators in the FMP that relate to biological diversity (FMP, pp44- 45). They consider forest health, Threatened Ecological Communities, threatened fauna and threatened flora. The draft review's purpose is to assess whether the performance targets for these, and the FMP's other 19 KPIs, have been met during the first half of the FMP's duration but there are no performance targets set in the FMP for three of the four KPIs concerned with biological diversity (TECs, threatened flora and fauna). Thus the reporting for these KPI's is altogether absent.	10/19/2018 1:41 PM
10	The FMP KPI's need to account for biodiversity, not as a commodity, but as a justice issue.	10/19/2018 1:31 PM
11	The reporting indicators in themselves is a useful approach. However it is a concern that some KPI's are recognised as being 'beyond the control' of or capacity of the respective Departments or Commission to implement.	10/19/2018 10:03 AM
12	KPIs do not reflect the full value of the forest, including its intrinsic value, and do not reflect support for a full range of forest resources.	10/19/2018 9:37 AM
13	Very poor. Trees are cut down in secret one tree at a time at different sights making it look like the forest isn't being logged. The money they make doesnt pay for the cost of logging . So why log if its costing money. This isnt reported. Im discusted with evaluations. They are false.	10/19/2018 2:22 AM
14	Several academic environmental experts have laughed at the mockery of the reporting, particularly in recommendations, that are cryptic, evasive and nonsensical.	10/19/2018 12:55 AM
15	Please see attached document. I have provided abridged contact information as I do not want my details to be published publicly. I can give further information if necessary if I am given an assurance that my details will not be published.	10/18/2018 11:50 PM
16	too narrow - see previous comments	10/18/2018 10:34 PM
17	There are many key environmental criteria that arnt measured or poorly measured, which gives great ambiguity to any recommendations. Far more investment in conducting effective research is needed to provide useful recommendations.	10/18/2018 1:01 PM
18	Use of colour codes & confidence rating makes reading the report easier. 24 KPI's are too many for any organisation to focus on & accurately monitor.	10/16/2018 10:47 AM
19	Information provided for individual performance indicators in the report of the mid-term audit is quite brief. While this format makes the report approachable it also limits the opportunity to examine and discuss important factors that may have contributed to the performance rating for individual indicators. This is important because there are a variety of factors that are likely to have affected plan implementation and reporting; these include: - lack of consistent monitoring and reporting protocols for indicators; - inadequate resources provided by Government for plan implementation; - policy impediments; - market conditions affecting the opportunity to utilise products generated by timber harvesting operations.	10/15/2018 6:43 PM
20	It found not only had the four relating to biodiversity – threatened fauna, threatened flora, threatened ecological communities and wetlands – not been met, but also that the Department of Biodiversity Conservation and Attractions failed to provide the clear targets, standardised methods, and species management priorities that the forest management plan, and the review, had relied on.	10/9/2018 1:26 PM
21	The WA public are certainly not being given a true and clear picture of what is really occurring in our native forests.	10/7/2018 7:11 AM
22	To dismiss the need to thin within appropriate areas of the conservation estate by simply saying "it should be noted that 62 per cent of the area covered by the FMP is in conservation reserves or protected areas within which active management by thinning is not supported under the plan" is a cop-out. The C&P Commission should completely reassess and review the need for thinning FOR BIODIVERSITY PROTECTION AND ENHANCEMENT, recognising that the additional benefits of increased water and timber yields are potentially important benefits of thinning, yet not as important as biodiversity protection.	10/6/2018 9:13 PM
23	Reporting is effective, even though it takes a lot of resources to do the monitoring. Please make sure that ForestCheck is funded!	10/2/2018 4:11 PM

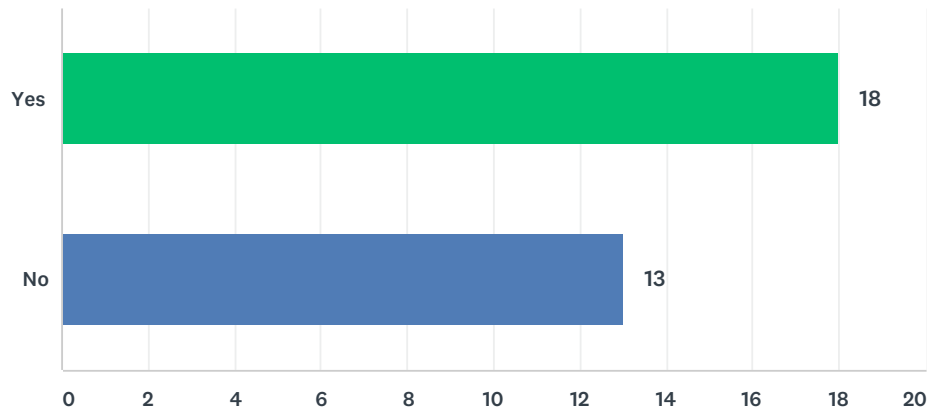
MID-TERM PERFORMANCE REVIEW OF THE FOREST MANAGEMENT PLAN 2014-2023

24 There are four Key Performance Indicators in the FMP that relate to biological diversity. They consider forest health, Threatened Ecological Communities, threatened fauna and threatened flora. The draft review's purpose is to assess whether the performance targets for these, and the FMP's other 19 KPIs, have been met during the first half of the FMP's duration but there are no performance targets set in the FMP for three of the four KPIs concerned with biological diversity (TECs, threatened flora and fauna). Why have no targets been set? and why is there no measurement system in place? This is very disappointing.

9/23/2018 5:20 PM

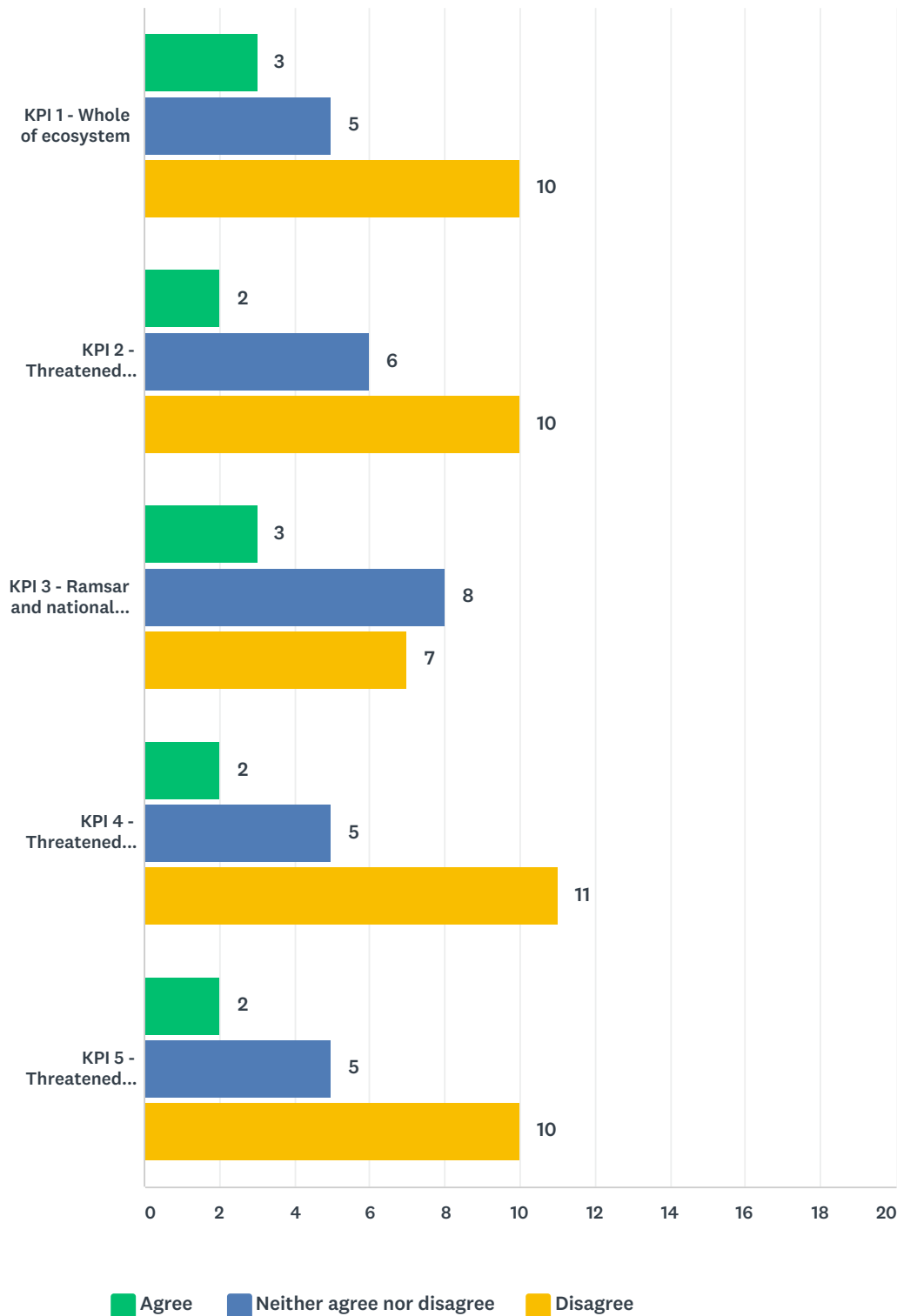
Q3 Do you want to provide a more specific perspective and comments on the draft mid-term review findings ?If you select YES - Question 4 to 11 provide opportunities to express your views and comments for each group of KPI findings; orlf you select NO - You will go straight to the the end of the survey where you will have an opportunity to attach a file.

Answered: 31 Skipped: 1



Q4 What is your view on the findings for the biological diversity performance targets ?

Answered: 18 Skipped: 14



#	PLEASE PROVIDE MORE DETAIL ON YOUR RESPONSE HERE:	DATE
1	Please refer to full text of WAFA submission	10/22/2018 1:08 AM

MID-TERM PERFORMANCE REVIEW OF THE FOREST MANAGEMENT PLAN 2014-2023

2	The report admits on p xiii: The assessment of the achievement of performance targets for KPIs related to biological diversity and ecosystem health and vitality required information to be available from the Department through relevant regional nature conservation plans or regional fire management plans. This information was not readily available at the time of the review requiring consideration of relevant and appropriate surrogate measures. Although these surrogate measures did in many instances provide an indication of the status of the performance indicator, the lack of data made it difficult to draw conclusions with confidence. So by the biological targets are rubbish by the report's admission.	10/19/2018 4:52 PM
3	More science needed on KPI 4 & 5 I note that almost the entire list of Threatened Ecological Communities are located on the SWan Coastal Plain, not in the forests. This should have been noted in the text and does to an extent vindicate forest management.	10/19/2018 4:16 PM
4	The overall assessment indicating the impacts of climate change on hydrology and the decline in vegetation density, particularly in eastern areas, whilst accurate, does not include assessment of other impacts from fire, disease, competing land use and forestry industry in other areas. The review of threatened fauna (KPI 5) appears inadequate. Minor adaptations to silviculture and fire management practices are not sufficient for the long-term protection of the many endemic vulnerable species dependent on the South West forests. A much more holistic and radical review of these practices is required and the Uniting Church advocates for the protection of all high conservation value forests and a transition away from all native forest logging.	10/19/2018 3:14 PM
5	KPI 1: Good target but not met. Veg density has reduced significantly. DBCA's view that this reduction is an outcome of climate change does not go far enough in establishing cause of climate change & whether past forest management has contributed to it. Holistic analysis & greater sense of responsibility for past outcomes necessary to get value from assessment process. All fauna, soil, water & other impacts need to be considered simultaneously with veg impacts. It is well known that regrowth forests are thirstier than old growth. This has profound meaning for how forests areas should be managed & how that itself impacts on rainfall levels, hotter, longer summers etc. Preserving more old growth would help to stabilise climate. I loved the holistic guiding light from the 2013 Statement by scientists re protecting WA's South-West forests. Ecological health as well as human health are interdependent. An extension of national parks/reserve system would be good to protect essential, complex biodiversity & saving more threatened species from extinction. KPI 2: Some criteria met but again failure to achieve targets. Fire has been problematic & as always a vexed question for foresters & timber industry. I recently read a very significant book about land management & while its focus was more on farming, its principles apply to the FMP. Title is Call of the Reed Warbler and author, Charles Massy. It looks at evolution of natural systems over millennia & means to restore a healthy functioning ecosystem after being harmed. KPI 3: Some progress in management of wetlands but overall a decline. A great variety of threats - logging, clearing, fire policy & frequency of seed setting and more - are identified and need to be addressed urgently. KPI 4: Threatened flora - the South-West is rightly a world famous hot spot of biodiversity & deserves better management to protect it into future. KPI 5: Threatened fauna - Some good work but again depletion reported. Nesting hollows are essential for some mammal and bird breeding - so loss of old growth forest is critical to them. Fallen logs, the "great untidiness of the Australian bush" - also is essential habitat for many species. Numbats should be cherished in their hollowed fallen trunks of Wandoo. Quokkas and the big cockatoos White-bellied Frogs and numerous other threatened species need better protection via a better FMP. Investing better in science-based conservation programs now will pay dividends in the future.	10/19/2018 2:53 PM

MID-TERM PERFORMANCE REVIEW OF THE FOREST MANAGEMENT PLAN 2014-2023

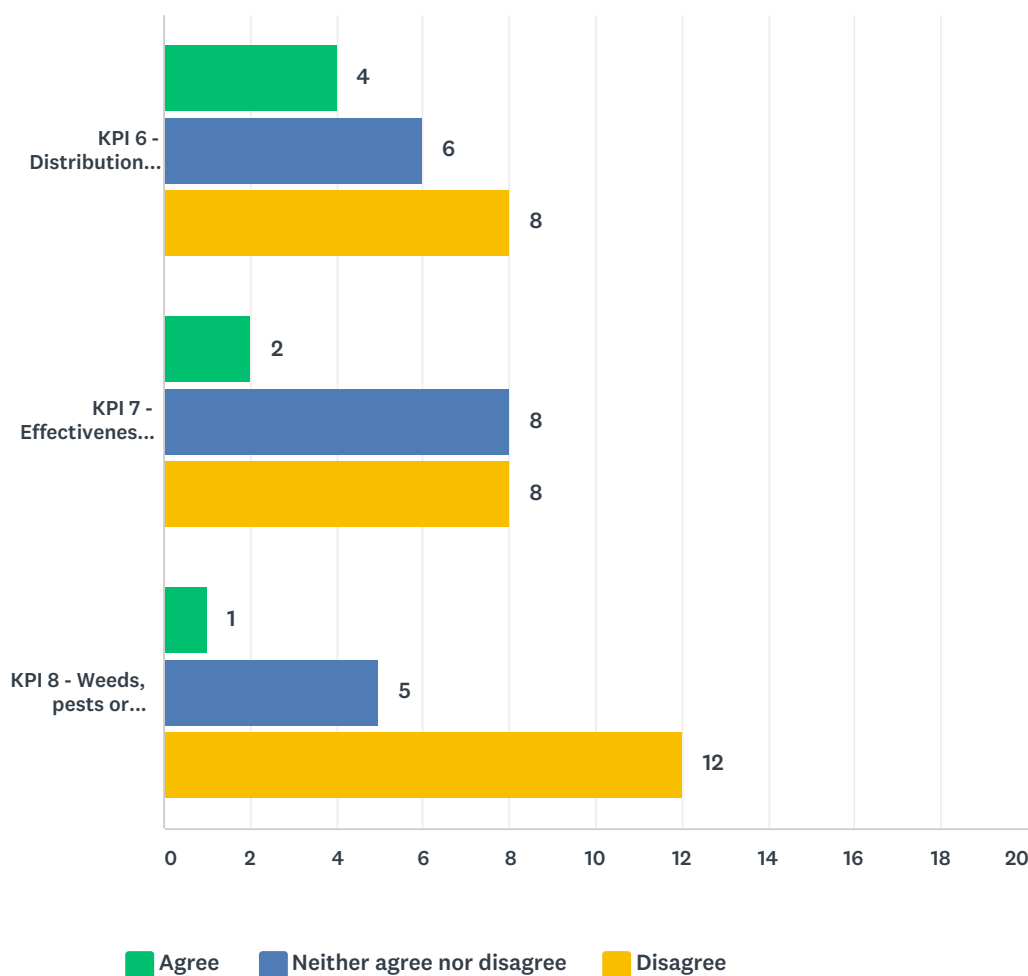
6	<p>When describing the 'status of the ecosystem' it says that the vegetation density has reduced in around 12 per cent of the forested area. This is mainly attributed to climate change. The recommendations do not include any immediate and practical measures. When it comes to KPI's 4 and 5 it simply states that the situation is getting worse for plants and animals, again without any proposed practical and immediate action. The South West forests have been identified as one of the thirty-four global biodiversity hotspots, recognized for their very high degree of species uniqueness (endemism) and diversity, and being under particular high level of threat (1). Apart from this slightly formal and official label, the forests are, of course, a place of beauty loved by many Western Australians and admired by others from overseas. They are unique. Once and once they're gone, they're gone. There is no bringing back a 600 year old tree. There's no bringing back the ecosystem that can sustain the old trees, after logging them (2). This is a very important fact doesn't appear to be taken into account in your measuring system. The Commission has a moral and legal obligation to protect the forests by following the principles of ecologically sustainable forest management (3) among which "that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations; and that the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision-making" The health and diversity of the forests is in decline, so it seems that the principles aren't used properly at the moment. Logging a sick forest is not something to do for the benefit of future generations. There is no sense of urgency to protect the health of the forest and the existing body of research on trees, forests, fire, flora and fauna and the relationship between people and the forests seems to have been overlooked. I would recommend the Commission look to outside expertise for help in improving its direction and use the immense body of existing knowledge. Research has already shown that it is not 'just' climate change that can dry out a landscape, but also clearing and logging: "55% to 62% of the observed rainfall decline is the result of land clearing" (4), and the best way to keep water in a forest is to leave the large old trees standing (5). (1) Gale, C. 2006. "The Southwest Australia Ecoregion: Jewel of the Australian Continent. Southwest Australia Initiative." (2) Prof Jamie Kirkpatrick, Forest Science Forum 12 Oct 2018 (3) Conservation and Land Management Act 1984 (4) The effect of land clearing on rainfall and fresh water resources in Western Australia: A multi-functional sustainability analysis. Mark A. Andrigh and Jorg Imberger UWA Centre for Water Research 2013 (5) Stopping land clearing and replanting trees could help keep Australia cool in a warmer future, The Conversation, Prof Clive Macalpine</p>	10/19/2018 2:53 PM
7	<p>Ecosystems will be impacted by climate change but using it as an excuse for failing to achieve targets is unacceptable. The impact of logging and development on our flora and fauna, since European settlement of this country, has been massive and now we have a double edged sword to deal with in our attempt to "save the bush" in this country for future generations.</p>	10/19/2018 2:20 PM
8	<p>See detailed submission for more information</p>	10/19/2018 9:38 AM

MID-TERM PERFORMANCE REVIEW OF THE FOREST MANAGEMENT PLAN 2014-2023

9	<p>Recommendation 1 It is important to consider increased temperatures along with a drying climate and impacts on the forests. Especially extreme heat and drought events not just the continued drying and warming. This if for all south-west forest ecosystems not just the eastern jarrah and wandoo forests. There is enough evidence showing areas of the northern jarrah forest along its western edges are also declining (peer review publications by Matusick et al., Ruthrof et al., Brouwers et al., Andrew et al. Some of these areas are changing from a tall eucalypt forest to shorter multi-stemmed forest. We need to understand what will happen to these sites over time and how will they extend and how quickly. The leaf area index of much of this forest is higher than it was prior to European settlement as many more younger trees and multi-stemmed trees. This equates to more water use and in a climate that is drier and warmer. So thinning trials need to be implemented, monitored and incorporated into standard silvicultural practice to ensure that the forest does not decline so rapidly as a result of drought. This will help ensure a more resilient forest and the maintenance of habitat for invertebrate and vertebrate fauna. Consideration should be given to finding suitable markets (e.g. Vietnam, China, Japan) for smaller piece sizes to help pay for such thinning activities. This should also be considered in Conservation Reserves if the impacts of drought and warming are likely to exacerbate the decline of the overall health of these forest areas and the functions these forest areas provide. Our forest management practices of the past have contributed to these declines and consequently we need to consider active management (e.g. thinning) activities to ensure their integrity into the future. Fire management in a drying and warming climate will become critical, especially in areas where drought collapses have occurred and will occur in the future. As has been observed (papers indicated above) considerable resprouting from coppice and epicormic shoots occurs resulting in higher stand densities. This will have an impact on how fire is managed in these changed landscapes. Comments above are relevant to a number of the KPIs of the plan. KPI 2. <i>Phytophthora cinnamomi</i> remains a threatening process as acknowledged in the plan. Other <i>Phytophthora</i> species are increasingly been linked to tree declines. For example, <i>P. multivora</i> has a wide host range (many the same as <i>P. c</i> but also other plant species) and appears to be displacing <i>Phytophthora cinnamomi</i> in the urban and peri-urban areas (being isolated more frequently than <i>P. cinnamomi</i>). For example, it is linked to tuart and <i>Agonis flexuosa</i> decline. A number of <i>Phytophthora</i> species are also being linked to <i>E. rudis</i> declines. A number of the 'new' <i>Phytophthora</i> species do kill native vegetation but the symptomology is different to <i>P. cinnamomi</i> which tends to express itself more along 'dieback fronts'. Frequently, individual plants are killed and the mapping and recording of these is more difficult and likely to be missed. Therefore, consideration needs to be given to how these should be mapped and managed. As mentioned above <i>P. multivora</i> is becoming a bigger issue in urban and peri-urban areas than <i>P. cinnamomi</i>. The question is why, and will it over time start to displace <i>P. cinnamomi</i> in other areas of the state especially in TECs? Mention about Myrtle Rust should be included around TECs and elsewhere. Especially, around management responses and how these will be implemented if/when the pathogen arrives from the east coast. Myrtle Rust implications need to also be considered across other KPIs in the plan. It is known to have a huge host range and many south-west plant species are known to be susceptible.</p>	10/19/2018 8:40 AM
10	<p>The research that recommendations are made from is either not available or poorly undertaken. There are also huge conflict of interest concerns with any research undertaken by FPC and DBCA which suggest any contrary findings are likely to be under-reported, omitted or ignored.</p>	10/18/2018 1:13 PM
11	<p>Generally Support Rec 5, 'Review measurement protocols for KPI 4, to establish principle causes of flora loss'. Disappointing that fire seemed to be the only criteria reported on here. What about impact of harvesting, roads, generally drying climate?</p>	10/16/2018 10:53 AM
12	<p>The Institute supports the recommendation relating to KPI 1 that the cause(s) of declines in vegetation density identified in the north eastern area of the forest should be investigated and reported on as a matter of priority. Field inspections undertaken by experienced Institute members have found that the patterns of decline are quite variable and appear to be related to terrain and landform features. Understanding these patterns will be important as it may assist in identifying management actions that could be effective in mitigating environmental stressors for particular sites. Reporting on KPIs relating to threatened ecological communities, threatened flora and threatened fauna appears to have been constrained by a lack of consistency in measurement protocols. This may in part reflect lack of consistency in approach by different parts of DBCA, and may also reflect inadequate resources for plan implementation. Reporting on KPI 3 for Ramsar wetlands is somewhat more informative, probably as a result of the more consistent approach to wetlands monitoring that has operated over several decades.</p>	10/15/2018 7:25 PM
13	<p>No problems</p>	10/2/2018 4:12 PM
14	<p>KPI 1 - performance target not achieved. KPI 2 - performance target not achieved. KPI 3 - performance target not achieved. also only medium confidence KPI 4 - performance target not achieved. and there is a low confidence in rating. you dont know! KPI 5 - performance target not achieved. also only medium confidence very disappointing given that your job is to manage the forests sustainably. It's hard to see if anything meaningful related to biodiversity has actually been achieved or whether there is even a clear target or measurement system in place.</p>	9/23/2018 5:27 PM

Q5 What is your view on the findings for the ecosystem health and vitality performance targets?

Answered: 18 Skipped: 14



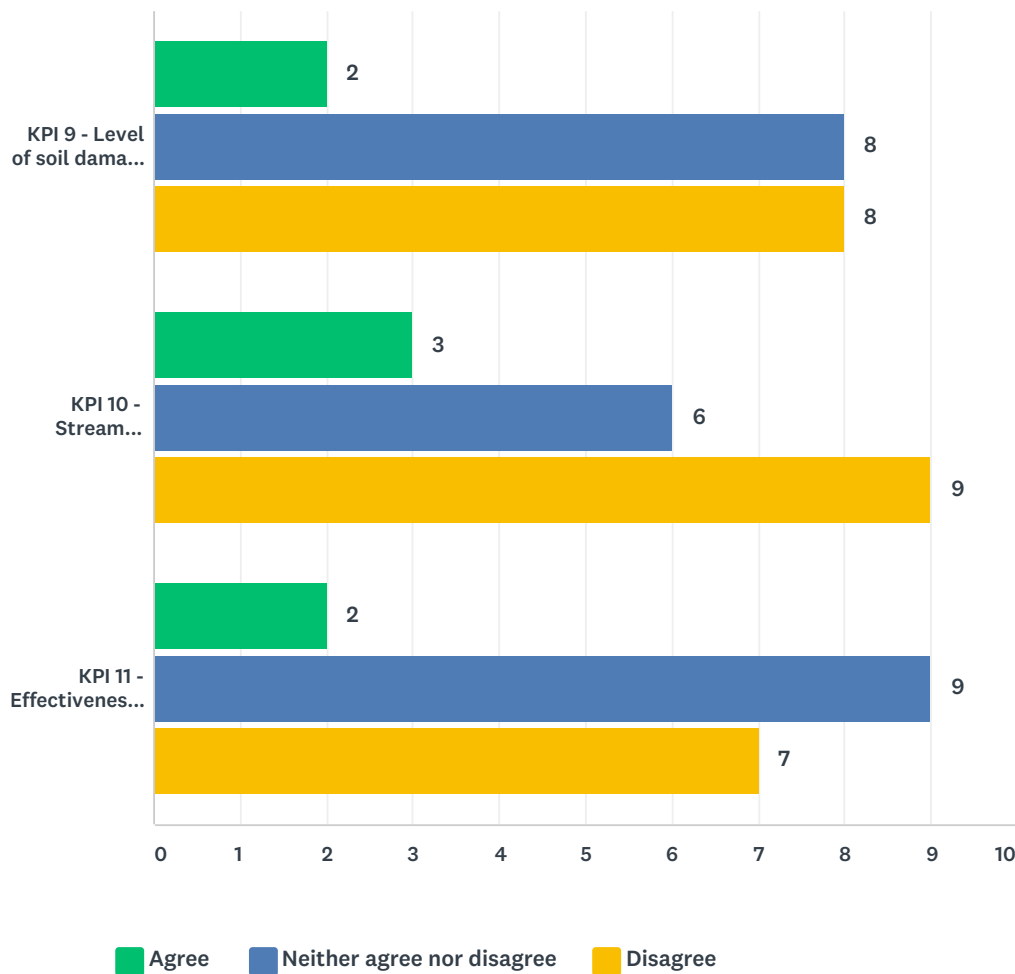
#	PLEASE PROVIDE MORE DETAIL ON YOUR RESPONSE HERE:	DATE
1	Please refer to full text of WAFA submission	10/22/2018 1:08 AM
2	Theoretical distributions are not a good measure of ecosystem health and vitality.	10/19/2018 4:55 PM
3	No mention of excessive weed burden and total lack of management in radiata plantations. Nor of rogue radiata in state forests	10/19/2018 4:16 PM
4	The KPIs relating to fire-management assume that the existing fire management practices are the most appropriate for the context of South West forests. With ongoing research still being undertaken, which includes reflection on Noongar fire management practices prior to European colonisation, a thorough reassessment of current fire management is warranted. It is noted that a transition away from native forest logging would reduce the number of roads and traffic through the forest and thus reduce the risk of the spread of disease.	10/19/2018 3:15 PM
5	KPI 6: Targets for threatened ecological communities are sadly not all being met...but some have been & that is only to be built on. Fire has been a big factor in forest management. Spacing of firing must accommodate the timing of maturing of seeds to protect those species that have their place in the ecological fabric of a healthy ecosystem. Again I mention the importance of preserving nest hollows in ancient trees. Traditional Aboriginal use of fire was refined over thousands of years & I think it would be excellent to tap into that knowledge respectfully. I hope that is already happening. KPI 7: Controlled burns - must be spaced so that viable habitats remain for flora and fauna. KPI 8: Re weed & pathogen control, I hope that forest management will pay deep attention to the management as put forth in Charles Massy's Call of the Reed Warbler. It seems that if we change the soil/water balance, adding poisons to reduce weeds & pests we disrupt the natural ecology.	10/19/2018 3:09 PM

MID-TERM PERFORMANCE REVIEW OF THE FOREST MANAGEMENT PLAN 2014-2023

6	The use of large machinery in our native forest is creating major problems. Impacting not only on the biodiversity of our forests by threatening the survival of many species of native plants, some probably not even identified, but also introducing disease and providing the opportunity for introduced plants/weeds to take hold.	10/19/2018 2:31 PM
7	See detailed submission	10/19/2018 9:38 AM
8	KPI 8 Some comments highlighted above regarding pathogens are relevant here. With regards to Phytophthora dieback a recommendation could include 'working with relevant NRMs (e.g. South Coast NRM), community groups (e.g. Dieback Working Group) to ensure Green Card training (and other relevant Phytophthora dieback management activities), is more widely implemented across the community. Phytophthora is not something that can be contained/managed by training just Staff and Contractors in the Department, it is a wider problem and should be recognised as such. The Department should consider training additional dieback interpreters who can then work outside agency land tenure (e.g. shire/councils) to ensure good and regular interpretation of Phytophthora dieback is across the susceptible areas of the state. Quambalaria piterika (a pathogen introduced from the eastern states) is widespread across the marri range, in particular in the more southern regions. It has the potential to impact on the health and reproduction of marri. It should be considered as a potential problem in the future and monitored accordingly. With the warming and drying climate native pathogens are starting to act like primary pathogens. Examples include Neofusicoccum australe - a pathogen that has a wide range of hosts and Quambalaria coyrecup (cause of cankers in marri).	10/19/2018 8:40 AM
9	In relation to KPI 6 the report would be more informative if the figure showing the distribution of time since fire distinguished between planned and unplanned fire. This should be a straightforward task as DBCA already collects fire statistics in a form that would allow this to be reported. There would be value in more detailed reporting on the time since fire distribution for Land Management Units that include a significant area of regrowth forest or forest rehabilitated following bauxite mining, as these forest types are more susceptible to severe damage during summer bushfires. The reporting for KPI 7 is superficial and does not provide useful information about what objectives were identified for planned burning, what were the success criteria, and how the outcomes of burning were monitored. Planned burning is a critical, and at times contentious aspects of DBCAs operations and deserves a more systematic and informative process for reporting on achievement of burn outcomes. Reporting for KPI 8 also appears to be information deficient, with Figure 7 showing a bias towards locations on the Swan coastal plain rather than in the main forest zone. This may reflect that weeds aren't a major problem across intact forest landscapes, but the information presented is not sufficient to draw this conclusion.	10/15/2018 8:32 PM
10	Please maintain prescribed burning targets. Without landscape scale prescribed burning, all other forest and ecosystem values can and will be destroyed...as witnessed by catastrophic fires in recent years (eg Yarloop, Boddington, Northcliffe...)	10/2/2018 4:14 PM
11	KPI 8 - in 80% of these, performance target not achieved. several KPIs with low to medium confidence. again, this needs to be taken seriously.	9/23/2018 5:29 PM

Q6 What is your view on the findings for the soil and water performance targets ?

Answered: 18 Skipped: 14



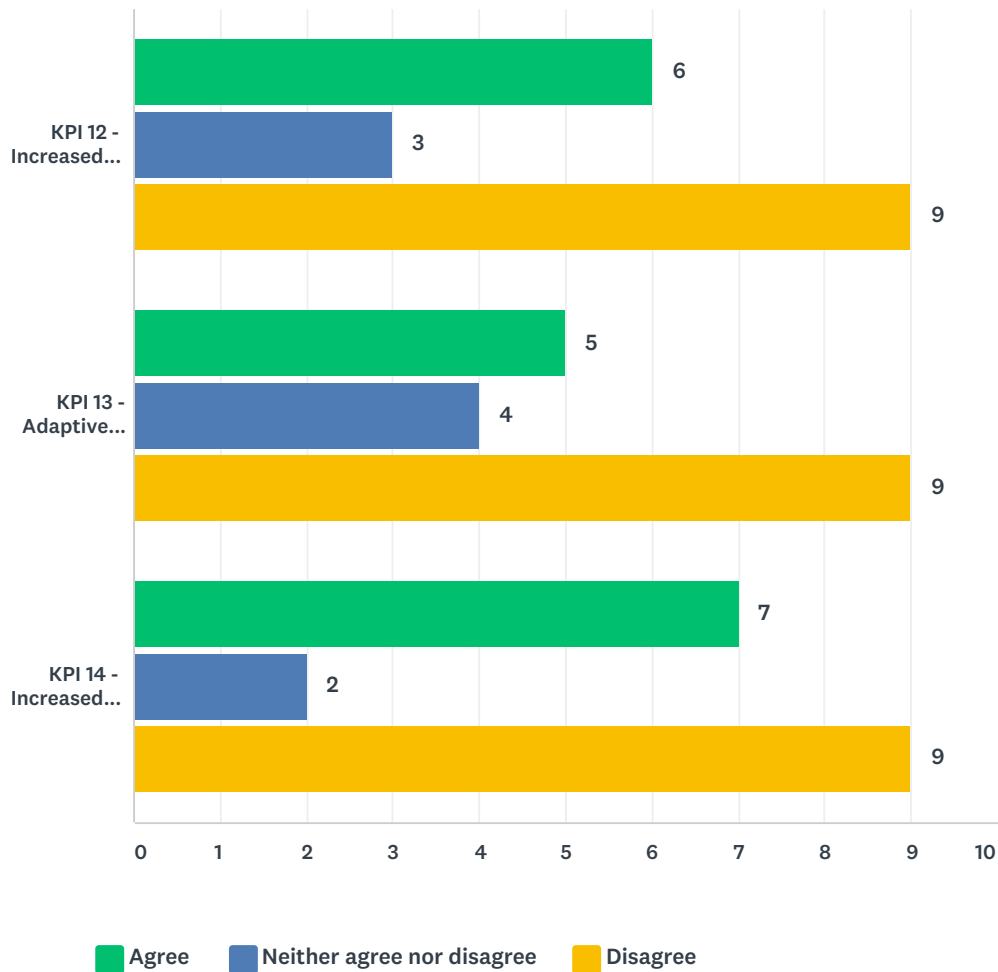
#	PLEASE PROVIDE MORE DETAIL ON YOUR RESPONSE HERE:	DATE
1	Please refer to full text of WAFA submission	10/22/2018 1:08 AM
2	KPIs 9 and 10 contingent on a drying climate. KPI 10 no applicable target because no areas were used for water production. Seriously?	10/19/2018 4:59 PM
3	KPI 9: The importance of conserving soil carbon, mycorrhizal fungi is immense. Losses of these elements and logging, clearance, fire bring soil damage and erosion gullies. KPI 10: Again I think of the importance of old growth forest in conserving water in soil compared to the demands that regrowth make upon that critically important resource. Riparian veg should always be protected so it can do its job of preventing run-off and keep water clean and save soil nutrients. KPI 11: Old growth, old growth!	10/19/2018 3:18 PM
4	It is noted that a transition away from native forest logging would reduce the number of roads and traffic through the forest and thus reduce the risk of soil damage. The Uniting Church WA is aware of other research that brings into question the effectiveness of silviculture treatments as a way to improve stream conditions and recommends broader academic consultation on silviculture's impacts on hydrology and forest health.	10/19/2018 3:15 PM
5	I think the level of soil damage resulting from timber harvesting totally unacceptable. Of course there will be negative impacts on stream condition and ground water levels.	10/19/2018 2:34 PM
6	See detailed submission	10/19/2018 9:39 AM
7	Not enough scientific research is being carried out to quantify soil damage and impacts on hydrology.	10/18/2018 1:14 PM

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8	<p>The information presented relating to KPI 10 is very brief and does not reflect the importance of this indicator for ecosystem health or human needs for water supply from forested catchments. There are potentially important differences in the response of groundwater and streamflow in catchments across the geographic range covered by the Forest Management Plan but there is little or no recognition of this in the mid-term audit report. The potential for silvicultural treatment to increase water yield from catchments in State forest in higher rainfall parts of the forest is a critical issue that was highlighted by the Silvicultural Review Panel for the previous FMP, and in the report prepared by Croton et al. (2014) as a background document to the current plan. It is the view of the Institute that the Commission and the relevant land and water management agencies have paid insufficient attention to management of forested catchments, and in particular to how silvicultural treatments to enhance streamflow and groundwater might be undertaken in an economically efficient manner where sale of wood products generated by thinning can offset the cost of treatment.</p>	10/15/2018 9:14 PM
9	<p>As already stated, I agree that it is essential that markets be found for low grade timber products (ie other bole volume) so that silvicultural treatments can be carried out. Without these markets, nothing can happen. There is no money for non-commercial silviculture.</p>	10/2/2018 4:15 PM
10	KPI 9 - target not achieved for soil damage	9/23/2018 5:31 PM

Q7 What is your view on the findings for the climate change and carbon cycle performance targets ?

Answered: 18 Skipped: 14



#	PLEASE PROVIDE MORE DETAIL ON YOUR RESPONSE HERE:	DATE
1	Please refer to full text of WAFA submission	10/22/2018 1:09 AM
2	Strongly disagree that increased knowledge has had any impact on management. note that the FPC recommends: That there is a continued focus of research towards understanding the implications of a drying climate on ecological function, biodiversity and forest health including consideration of treatments to improve the forests resilience in a future drier climate. To do this the biological surveys and sample plots needs to actually be done.	10/19/2018 5:00 PM

MID-TERM PERFORMANCE REVIEW OF THE FOREST MANAGEMENT PLAN 2014-2023

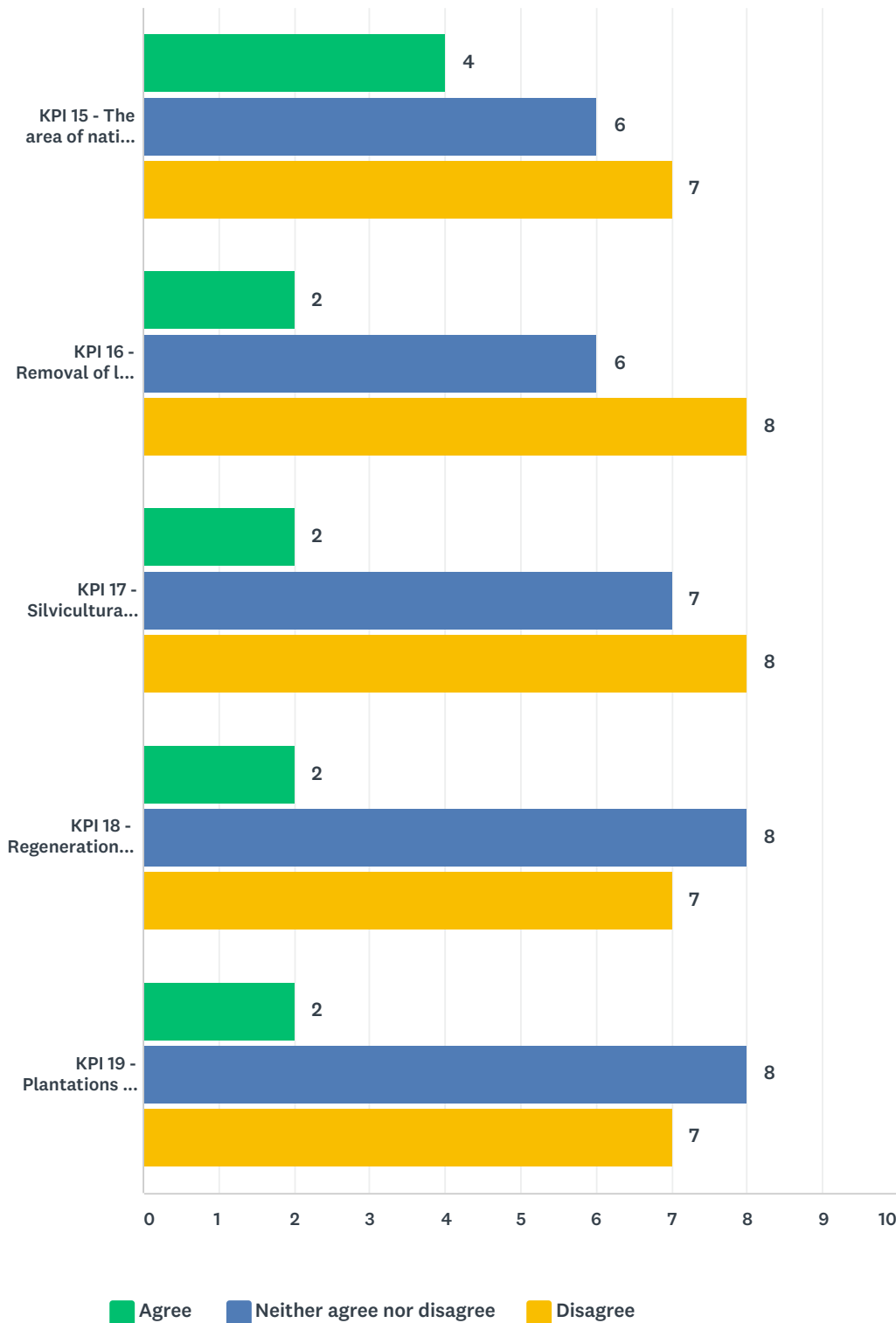
3	<p>KPI 12: Trends in climate change should be the underlying driver in how forests are managed. Plantations in growth phase are thirsty and as South-West increasingly heats and dries, we need forestry practices that demand lower water consumption and which are likely to increase rainfall. KPI 13: Old growth forest preservation of course is a central adaptive response; also flora and fauna refugia to conserve biodiversity so necessary to enable greater coping as conditions change. Protecting precious wetlands essential but we know that efforts to do so are sometimes failing. Green corridors linking conserved areas are essential to strengthening flora & fauna capacity to adapt. It is fascinating what Bush Heritage Australia is doing in this regard at this critical stage when we are losing so much. I hope BHA is doing a submission! Increasing pace of climate change is making practical positive responses increasingly urgent. No more time to put off what we must do. KPI 14: Logging and burning windrows releases carbon into air and atmosphere and contributes to climate change. Wildfires contribute heavily to this. Existing carbon stores in soil and vegetation are to be highly valued and protected. Old growth forests are good at this and should be honoured, loved and protected. The FMP should fix any practices that squander carbon stores. Intensive use of forest products for building and furniture-making do extend the capture of carbon in timber compared to some other end uses for harvested timber. Carbon releasers like woodchips, firewood - and certainly burning to generate electricity should be phased out as quickly as possible.</p>	10/19/2018 3:44 PM
4	<p>It is of great concern that KPI 14 was not met. The Uniting Church has a long-held concern about the impacts of climate change and recognises the value of forests as carbon stores. A key reason for the Uniting Church WA's decision to call for a transition away from native forest logging is in recognition of the carbon emissions caused by logging and of the carbon sequestration and storage potential of protected forests. Indeed the Uniting Church WA would like to see a further KPI relating to the required retention of carbon in forests and the financial benefit of any related carbon credits.</p>	10/19/2018 3:15 PM
5	<p>There is already a huge body of knowledge about the climate, about what to do with forests in this changing climate, and about the amount of carbon stored in forests. The two main findings are that forests and trees, particularly mature old trees, can capture and store water in the soil much better than forests that have been logged, and that these same old trees are much better carbon storage vehicles than young trees. Please see for example (1) Stephenson, Das and Zavala (2014), "Rate of tree carbon accumulation increases continuously with tree size", Nature volume 507, pages 90–93 (06 March 2014) (2) Ore (2014), "Big old trees grow faster, making them vital carbon absorbers", The Conversation (17-1-2014)</p>	10/19/2018 3:00 PM
6	<p>Our world is being impacted by climate change and we're not just dealing with a small SW portion of WA. We need to change our destructive practices and look at how we can do things different and better for the benefit of future generations. If there is to be a future things need to change now. Many approaches are required to meet necessary carbon targets.</p>	10/19/2018 2:42 PM
7	<p>See detailed submission</p>	10/19/2018 9:39 AM
8	<p>KPI 12 Recommendation 14 is very relevant. This is something that should be actively resourced immediately at a large scale across different forest types. KPI 13 Recommendation 15 is very relevant. This is something that should be actively resourced immediately and adaptive management put in place rapidly as research findings become available. With respect to KPIs 12, 13 and 14 there is overlap. Consequently, opportunities exist to work with research organisations to create a Centre of Excellence or similar that is transdisciplinary in nature, well-coordinated and managed to address some of the major issues that have been highlighted. This will help facilitate attracting industry and Commonwealth funding to address some of these major issues highlighted in this document. The state of Western Australia has not been proactive enough in such initiatives.</p>	10/19/2018 8:41 AM
9	<p>The lack of research backing up the findings is very concerning. And that recommendations to continue logging are made despite this recognised lack of knowledge. Hugely concerning.</p>	10/18/2018 1:15 PM
10	<p>Agree that this should have been prioritised for action in the first quarter of this plan, not left til possibly the 2nd quarter. 'No new plots' created to study the impact of the greatest threat to forestry and mankind! Carbon storage is essential if we are to limit global warming to <2C increase, trees are currently the only primary mechanism that can achieve removal of existing CO2 from the atmosphere. For financial, social & environmental reasons, it is inconceivable that you have not focused on this KPI.</p>	10/16/2018 11:01 AM
11	<p>Knowledge of trends in climate and potential adaptive response to a changing climate is a critical issue for forest management, and the report provides a reasonable summary to achievements during the first stage of plan implementation. The lack of progress towards increased knowledge of carbon stocks and trends in forests is quite clearly a consequence of inadequate resourcing. Whether or not requesting DBCA to re-prioritise efforts to address this shortfall will be effective in addressing this indicator during the second half of the plan remains to be seen. If resources and expertise are insufficient overall then shifting effort from one priority to another won't address the problem in the longer term.</p>	10/15/2018 9:14 PM

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12	Adaptive response is important, which means silviculture (ie thinning). Goodness knows what will happen in the conservation areas of our forests where no silviculture can happen!	10/2/2018 4:17 PM
13	KPI 14 - no progress	9/23/2018 5:32 PM

Q8 PRODUCTIVE CAPACITY What is your view on the findings for the productive capacity performance targets ?

Answered: 17 Skipped: 15



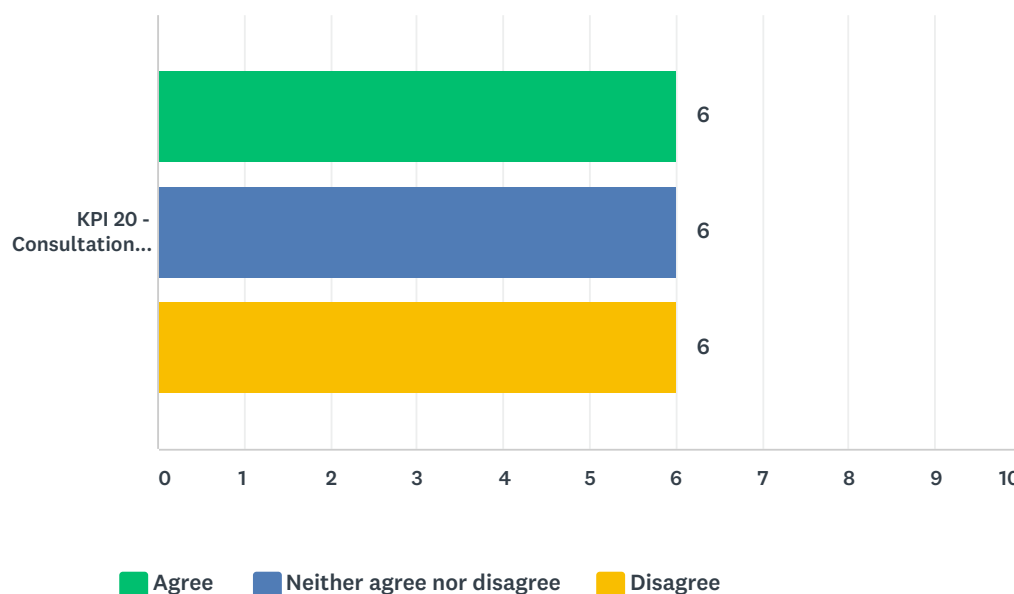
#	PLEASE PROVIDE MORE DETAIL ON YOUR RESPONSE HERE:	DATE
1	Please refer to full text of WAFA submission	10/22/2018 1:09 AM
2	Continued use of slow growing species for low income uses. These KPIs hide the unacceptable use of forests which are worth more for tourism, including regrowth.	10/19/2018 5:04 PM

MID-TERM PERFORMANCE REVIEW OF THE FOREST MANAGEMENT PLAN 2014-2023

3	The poor following of the silvicultural prescription is appalling. However the prescriptions themselves are in dire need of updating. Gap creation should be phased out as causing too much loss of structural resilience.	10/19/2018 4:16 PM
4	KPI 15: A viable reserve system that will protect the range of vegetation types should expand. So much forest is alienated in road networks, mining and industrial activities. We urgently need to protect what is left. Instead of top priority allocated to wood production, a comprehensive encompassment of all the other values of an intact forest/woodland estate should be practised across what is left of our South-West forests and woodlands. We need to veer away from practices that release carbon into our atmosphere. Ecotourism and environmentally sensitive jobs should be encouraged to produce wealth from South-West region. What about honey production? I note increasing price of honey from Jarrah - Is this a manifestation of growing scarcity of blossom and bees? KPI 16: I don't know about this aspect. KPI 17: Thinning of forests - Would not this disrupt soil, interfere with water retention, increase run-off soil nutrients and possibly increase likelihood of erosion gullies? I don't know about these effects but I feel uneasy about the practice of forest thinning. If it is about obtaining timber to burn for power generation, that would not be sensible when solar and wind power are there to be used instead. KPI 18: Again I am extremely uncomfortable about post-logging burn-off of left over material - This must release immense quantities of carbon into the atmosphere. In these days of exacerbated climate change, we cannot afford such a practice. Nor can our South-West wildlife be subjected to such habitat loss. KPI 19: Let it not be that there are locked in agreements/contracts that must be adhered to in the face of changing conditions so that they would cause further harm regardless of what new evidence comes forth. KPI 17: have little idea of how thinning forest cover works but do wonder how it affects flora and fauna, soil and water retention and how all that interacts with climate	10/19/2018 4:13 PM
5	The Uniting Church WA acknowledges the achievement of KPI 15 but questions why there is no KPI to measure the quality of the new forest areas and their ecosystem functions. A net measure of dedicated areas does not necessarily equate to a measure of equivalence. The Uniting Church WA questions the measures for productive capacity used in this review and requests a review into the value of the forests if kept protected. If a transition away from native forest logging were to occur what would be the value of the protected forests for tourism, recreation, bee-keeping and as carbon stores?	10/19/2018 3:17 PM
6	The production capacity of our native forests are declining and an alternative approach to wood production or replacement products need to be explored and supported.	10/19/2018 2:46 PM
7	See detailed submission	10/19/2018 9:39 AM
8	KPI 16. Rec.17. I'm not clear on the intent of the recommendation that calls for 'other bole volume in Jarrah forests to meet forest health & productive capacity'? It surprises me that all Removal of Wood Product volumes were so far below allowable quotas. Who & how are these volumes surveyed? What % goes to sawmills? I see a high number of timber trucks on the SW Hwy. south of Donnybrook. With the high level of residential housing development in the SW & Perth, I would have expected a high demand for framing timber. I have noted several instances where trees 100+yo, have been removed. Why is this permitted? Surely the habitat & flora associated with such old trees is worth far more to the region if preserved rather than given away as wood chips? KPI 19. what are 'Sawlogs' as distinct to Industrial Wood Production'?	10/16/2018 11:27 AM
9	Indicators relating to productive capacity of native forests and plantations are generally reported in adequate detail, and the findings are in accordance with expectations. Topics requiring ongoing focus and action during the second half of the plan implementation period include: - taking action to reduce further losses of plantation from bushfires and drought, and increasing the annual plantation establishment target to a level sufficient to meet long term supply commitments and expected increases in demand for wood products; - minimising further permanent loss of native forest estate resulting from roads, infrastructure development and land exchanges; - investigating options to increase the commercial utilisation of bole logs for a variety of uses to facilitate proper silvicultural outcomes and provide economically efficient thinning treatment of catchments to provide water for environmental values and human use. The Commission and DBCA should identify areas of high quality forest within the bauxite mining leases covering the northern jarrah forest and bring to the attention of Government the importance of excluding mining from these areas. The critical importance of protecting high quality, dieback free areas of forest from mining is emphasised by the decision of the WA Government to allow direct exports of un-processed bauxite ore from leases on State forest without further review by the Environmental Protection Authority (refer to attached correspondence between the INstitute of Foresters and the Chairman of the EPA)	10/15/2018 9:45 PM
10	I agree with your findings, but again state that it is important that markets are found for the low grade products that are currently left behind - ie wasted. Markets do exist overseas. You should clearly state in your final report that if local markets cannot be found, then FPC should actively seek and secure overseas markets to utilise the available other bole volume resource.	10/2/2018 4:20 PM
11	KPI 17 - no progress. has not been actioned!	9/23/2018 5:34 PM

Q9 What is your view on the findings for the heritage performance targets ?

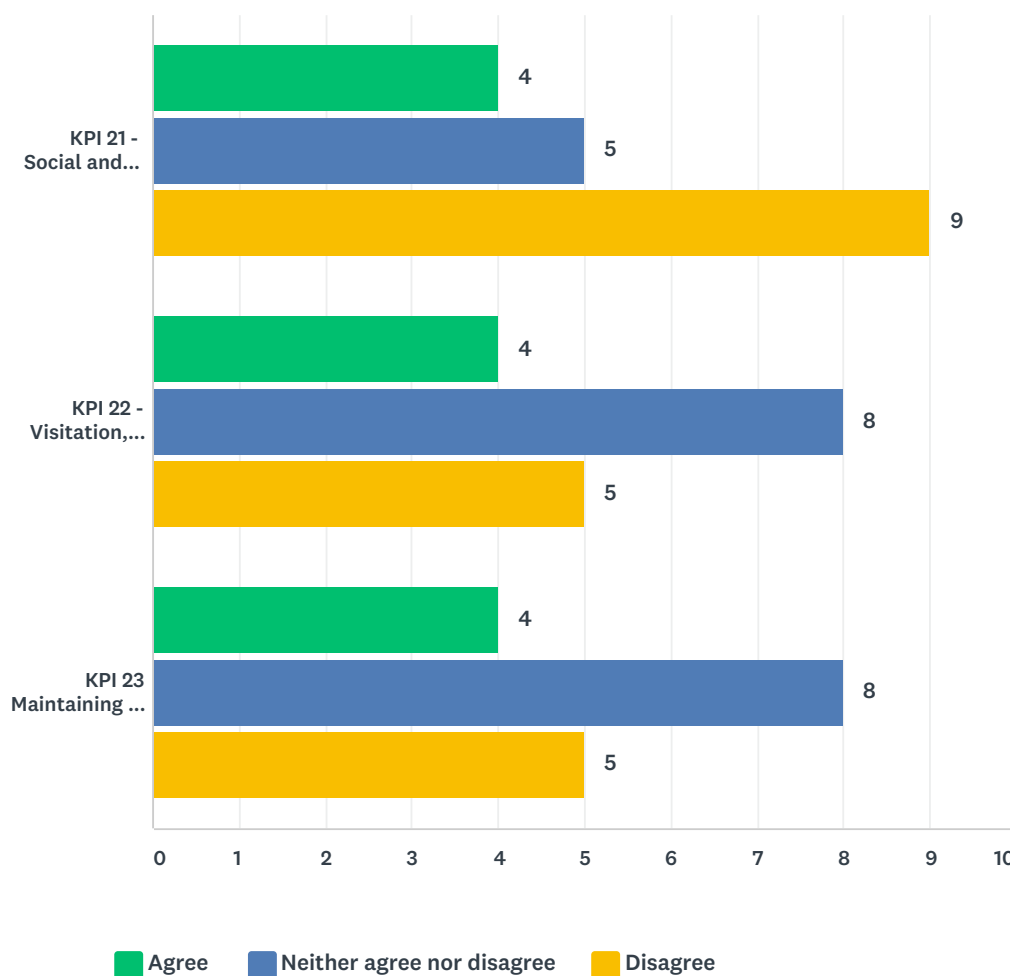
Answered: 18 Skipped: 14



#	PLEASE PROVIDE MORE DETAIL ON YOUR RESPONSE HERE:	DATE
1	Please refer to full text of WAFA submission	10/22/2018 1:09 AM
2	Open-minded respectful engagement of Nyongar in forestry management would be so sensible and I believe so beneficial.	10/19/2018 4:15 PM
3	The Uniting Church WA supports the stated engagement and inclusion of Noongar people and looks forward to the positive developments that are possible under the SWNT Settlement. The Uniting Church WA endorses the Indigenous Ranger program and encourages an expansion of the program.	10/19/2018 3:17 PM
4	Your KPI's and updates refer a lot to policies and procedures, which is of course a good Western government practice in many other instances, but seems woefully inadequate here. There is no connection with what Noongar people themselves are saying, and it doesn't talk about the principle of looking after the land for current and future generations. I am not a Noongar, but I've had the good fortune of hearing Noongar elder Mitchella Hutchinson explain the significance of the forest, of the trees – in particular old trees, where ancestors live. And the Australian Aboriginal Medicine Men and Women group says: "The Noongar forests are sacred to us. These places of old forest were and continue to remain spiritual reservoirs. The destruction of these very sacred places will destroy links to our ancestors which will eliminate our capacity to remain spiritually healthy" (1) I recommend incorporating KPIs that actually protect the forest for future generations, Noongar or otherwise. (1) Ballardong Noongar Budjar, 'Healthy Country – Healthy People', Prepared by Ballardong NRM Working Group, A Standing Committee of the Avon Catchment Council	10/19/2018 3:01 PM
5	For the consultation to be incomplete at this stage, half way through the process, is unacceptable.	10/19/2018 2:47 PM
6	The processes of consultation for the FMP and the review are not cutting edge.	10/19/2018 9:40 AM
7	The report provides evidence of satisfactory progress with consultation and engagement of Noongar people, although much remains to be done. In particular, the potential for greater engagement of Noongar people in traditional fire management activities should be pursued as a supplement to the work of DBCA.	10/15/2018 9:45 PM
8	No comments	10/2/2018 4:20 PM

Q10 What is your view on the findings for the socio-economic benefits performance targets ?

Answered: 18 Skipped: 14



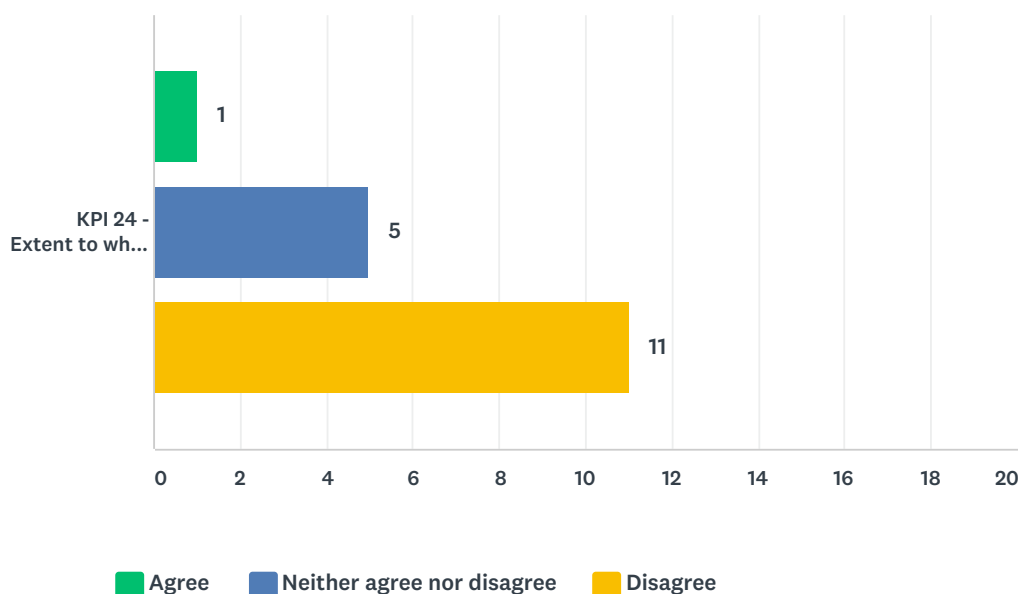
#	PLEASE PROVIDE MORE DETAIL ON YOUR RESPONSE HERE:	DATE
1	Please refer to full text of WAFA submission	10/22/2018 1:10 AM
2	These KPIs are fantasy	10/19/2018 5:04 PM
3	Timber-getting was once an adulated pioneering activity but as time went on, and forestry became more dominating over wider area, it might have overwhelmed other economic activity that could have a less impact on the natural environment. Maybe it's time to help timber workers and families to transition to other activities, tourism, guided forest hikes, birding expeditions, wildflower explorations, accommodation, honey production, retreats for artists and writers. Because of climate change, we must learn how to relate to South-West forests more gently so that they can reduce impact on climate deterioration. No jobs that bring major increase carbon release into atmosphere!	10/19/2018 4:27 PM
4	We need to resource DBCA to better perform their responsibilities.	10/19/2018 4:16 PM
5	The Uniting Church WA believes that distinction needs to be made between plantation timber and native forests to accurately assess the socio-economic value of each separately. Calculating them together, as has been done for KPI 21, does not allow for a true evaluation of each practice.	10/19/2018 3:17 PM

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6	<p>Recently, 15,000 Western Australians signed a petition, saying they oppose the logging of old growth forests. This is quite a significant social signal, which is not included in your report. The South West Development Commission, on their website, puts the delivered value of hardwood (ie native forests) at \$29.8 mln (2016/2017) and the value of tourism at \$1.557 mln (2017). When asked what they most appreciate about Margaret River, 80% of people said: the bush, the forests. And this included local business people and shop owners, as well as tourists (1). I would recommend that the Commission vastly broadens its perspective when looking for social and economic benefits. Once it's gone, it's gone. (1) Prof Carmen Lawrence on sense of Place, Forest Science Forum 12 Oct 2018</p>	10/19/2018 3:04 PM
7	<p>I question the social and economic benefits of a declining native forest timber industry. Who visits these logging sights and reports that they are satisfied with the results/effects?</p>	10/19/2018 2:53 PM
8	<p>See detailed submission</p>	10/19/2018 9:40 AM
9	<p>The findings regarding social and economic impacts do not take full cumulative impacts of the industry into account. economic and social benefits are overstated. Conflict of interest, research should be conducted independently.</p>	10/18/2018 1:17 PM
10	<p>Recreation and visitor facilities have, in general, been well funded during the period of the plan and this reflects in the overall achievement of these KPIs. The need for funding to maintain a network of strategic roads and bridges is essential to successful implementation of many of the actions in the Plan.</p>	10/15/2018 9:45 PM
11	<p>The social and economic benefits from the timber industry cannot be overstated. The timber industry is a vitally important part of the social and economic fabric of the southwest of WA. And timber products are set to become the material of the 21st century. It is renewable and environmentally friendly. The number of multi-storey buildings being constructed around Australia is increasing rapidly. Any notion that the level of our native forest timber industry should be reduced or eliminated (as promulgated by the WAFPA) should be dismissed out of hand.</p>	10/2/2018 4:27 PM

Q11 What is your view on the findings for the plan implementation and management performance targets ?

Answered: 17 Skipped: 15



#	PLEASE PROVIDE MORE DETAIL ON YOUR RESPONSE HERE:	DATE
1	Please refer to full text of WAFA submission	10/22/2018 1:10 AM
2	This is rubbish. The scientists involved in the research are deeply concerned about the loss of biodiversity due to overburning, poor hygiene and other management issues not to mention the unsustainable logging in the first place.	10/19/2018 5:06 PM
3	I m running out of time to lodge my submission but just want to finish with a plea that more scientists are welcomed into this whole process of how we should manage South-West forests and woodlands so that we work with the forests so that they can be sustainable.	10/19/2018 4:30 PM
4	I am keen to see the follow up on the various KPI's plus the review of Jarrah silviculture.	10/19/2018 4:16 PM
5	The Uniting Church WA would like to see a broader scope of research engaged with as part of an independent scientific review of the current forest management practices.	10/19/2018 3:18 PM
6	Without sufficient funding the agencies who are responsible for the conservation and management of our native forest will be ineffective and the outcomes will be devastating to this major natural asset. Removal of mature trees means there will be no future hollows for our endangered birds to breed. In recent years more and more Carnaby Cockatoos are visiting our area of Leschenault and surrounding areas to feed in the large trees. Unfortunately many of the trees are now being removed because people are in fear of fire and they believe that removing the trees will save their home.	10/19/2018 3:08 PM
7	See detailed submission	10/19/2018 9:40 AM
8	It is clear institutional frameworks are continuously being eroded to robustly support the science and management to adequately manage our forests and woodlands into the future. For example, there is no longer a forest pathologist conducting research or providing advice in DPCA, with entomology, plant physiology, fire ecology, soil science, remote sensing, and other disciplines under severe constraints with an aging cohort of people, and positions not replaced or rarely so. Forests or critical for everybody and everything, without good management we put society in general at risk. Significantly more human resources need to be put into the forest sector as soon as possible.	10/19/2018 8:50 AM
9	Conflict of interest. Assessments should be independent of FPC and DBCA.	10/18/2018 1:18 PM
10	You cannot conserve something if you continue to use it	10/16/2018 12:32 PM

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11	The report notes a reduced investment in research, reflecting the broader issue of insufficient resources for proper implementation of the plan. The limited output of published scientific research on productive capacity, climate change and carbon cycles suggests that current research activities do not support the full scope of the Plan and may need to be reviewed to ensure a better balance of effort.	10/15/2018 9:46 PM
12	Hmmm..."institutional framework"..????? the current Labor government appears a tad lukewarm regarding our native forests. It supports the current FMP, but is doing nothing to encourage the marketing of the available other bole volume...and unless markets can be found, next to nothing can happen regarding improving or maintaining the health and productive capacity of our native forests. Markets do exist. You must recognise this and clearly state that FPC must be encouraged to seek and secure these markets, wherever they may be. And I have to say that its a joke that Alcoa is able to mine our best jarrah forests, and sell unprocessed bauxite to overseas markets, when the FPC is unable to sell to overseas markets the low grade logs that it salvage harvests from the very forests that Alcoa digs up and destroys.	10/2/2018 4:33 PM
13	I'm sorry but given my previous comments on the KPIs and lack of measurement, this should be marked as performance target not met, but you have marked it as on track! please explain how the framework is supporting conservation and sustainable management of forests?	9/23/2018 5:37 PM

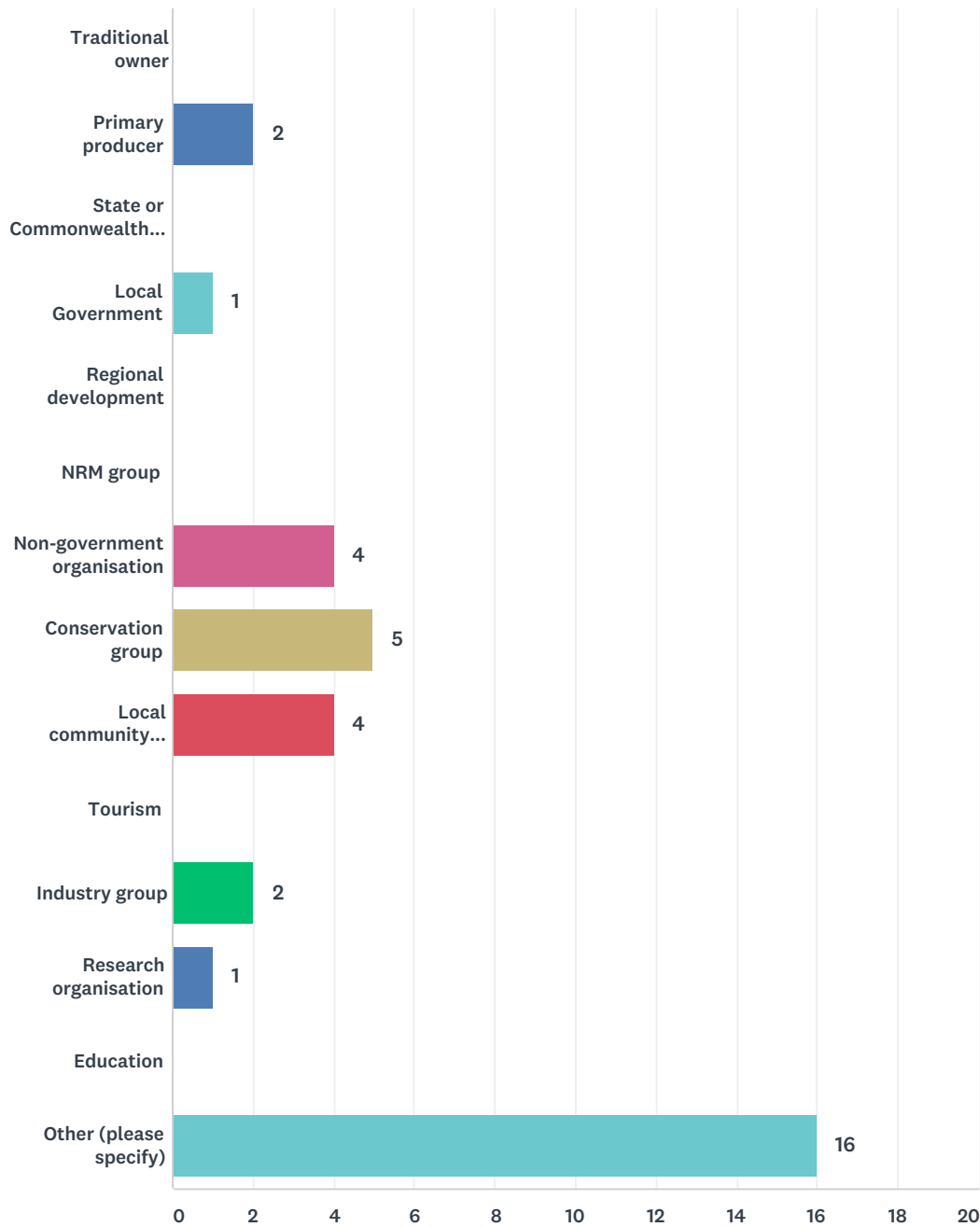
Q12 If you have any additional documents or information to support your views and comments, please upload the supporting file here.

Answered: 18 Skipped: 14

#	FILE NAME	FILE SIZE	DATE
1	Wafa submission draft mid-term review FMP 2014-2023.pdf	732.6KB	10/22/2018 10:21 AM
2	Bushwalking WA_Comments on performance review of FMP 2014–2023_19Oct2018.pdf	2MB	10/22/2018 12:07 AM
3	Public Submission_FMP Mid-term Review 2018.pdf	1.2MB	10/21/2018 10:44 PM
4	FMP 2014-2023 Review submission - general.docx	12.3KB	10/19/2018 4:50 PM
5	Letter - LTIC Re. FMP Mid Term Review.pdf	1.3MB	10/19/2018 4:43 PM
6	a submission to the mid-term review..docx	17.6KB	10/19/2018 4:17 PM
7	FMP Mid Term Submission WA Forest Communities Network.docx	94KB	10/19/2018 3:27 PM
8	Unconfirmed Minute 2018 Synod Protecting Our Forests Resolution.docx	186.1KB	10/19/2018 3:27 PM
9	FMP mid term review submission WAPRES.pdf	222.4KB	10/19/2018 3:19 PM
10	xxxx draft mid-term performance review of the FMP 2014-2023.pdf	47.9KB	10/19/2018 2:11 PM
11	disgrace.jpeg	339.2KB	10/19/2018 1:32 PM
12	Hon Diane Evers MLC FMP Mid Term Review Submission FINAL.pdf	775.6KB	10/19/2018 9:57 AM
13	Independent Submission to the Draft Mid-term Performance Review of the Forest Management Plan 2014-2023 by Cath Price.pdf	932.7KB	10/19/2018 12:57 AM
14	Submission on Review.pdf	191.1KB	10/18/2018 11:50 PM
15	WA Forest Management.pdf	30.2KB	10/16/2018 11:29 AM
16	Statement 728 - Direct Export of Bauxite Response to IFA 2 February 2017.pdf	152.4KB	10/15/2018 9:46 PM
17	FMP Review - Mid BICWA.docx	26.8KB	10/9/2018 1:26 PM
18	north of Nannup in St Johns Brook conservation park.jpg	192.9KB	10/6/2018 9:13 PM

Q14 What sector do you represent ?

Answered: 31 Skipped: 1



#	OTHER (PLEASE SPECIFY)	DATE
1	Individual	10/22/2018 1:11 AM
2	citizen	10/19/2018 5:08 PM
3	Concerned citizen	10/19/2018 4:32 PM
4	Environmentalist	10/19/2018 4:17 PM
5	Community Group	10/19/2018 3:31 PM
6	Private company	10/19/2018 3:21 PM
7	Citizen	10/19/2018 3:05 PM
8	Media	10/19/2018 1:34 PM

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9	Member of Parliament for the South West	10/19/2018 9:59 AM
10	Private citizen	10/19/2018 2:25 AM
11	concerned and informed community member	10/19/2018 1:00 AM
12	Concerned member of the public	10/18/2018 11:52 PM
13	south west resident	10/18/2018 10:37 PM
14	Professional association	10/15/2018 9:51 PM
15	Professional forester	10/2/2018 4:35 PM
16	interested community member	9/23/2018 5:38 PM