

Draft Forest Management Plan 2014-2023

Conservation Commission of Western Australia

Analysis of Public Submissions

on the

Draft Management Plan

April 2013



Department of
Environment and Conservation



Introduction

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

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

The release of the Draft FMP was supported by:

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

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

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

Analysis of submissions

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

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

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

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

Pro forma A: Conservation Council of Western Australia

Pro forma B: Western Australian Forest Alliance

Submission analysis

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

1. The draft plan *may be* amended if a submission:
 - a. provides additional resource information of direct relevance to management
 - b. provides additional information on affected user groups of direct relevance to management
 - c. indicates a change in (or clarifies) legislation, management commitment or management policy
 - d. proposes strategies that would better achieve management goals; or
 - e. indicates omissions, inaccuracies or a lack of clarity.

2. This draft plan *may not* be amended if a submission:
 - a. clearly supports the draft proposals
 - b. offers a neutral statement or no change is sought
 - c. addresses issues beyond the scope of the draft plan
 - d. makes points that are already in the draft plan or were considered during its preparation
 - e. is one among several widely divergent viewpoints received on the topic and the proposal in the draft plan is still considered the best approach; or
 - f. contributes options that are not possible (generally due to some aspect of existing legislation or government policy).

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

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

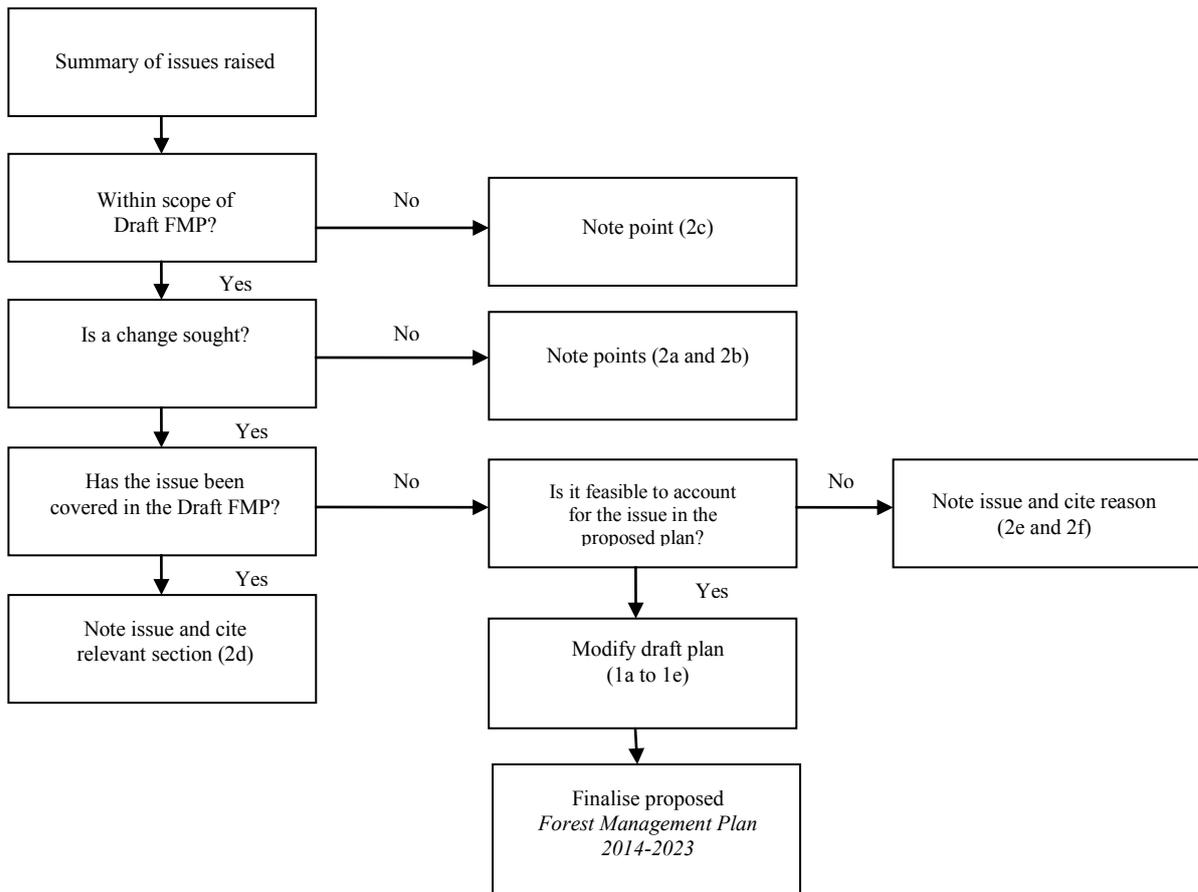


Figure 1: Analysis process

Summary of comments

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

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

Table 2: Summary of comments categorised

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

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

Comments received on proposed key changes and management options

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

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

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

Pro forma submissions

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

Key themes identified from submissions

The main themes with a conservation focus are as follows:

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

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

The main themes with an industry focus are as follows:

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

Other major themes or comments:

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

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

Appendix 1: Analysis of public submissions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Comment Number	Theme	Comment	Analysis category	Response
261	Silviculture for water and ecosystem health	Oppose both silviculture for ecosystem health and for water production; cannot support thinning for either water or ecosystem health, without further modelling and analysis of predicted impacts.	2e	Noted. The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions for implementation. Conditions include the approval of a catchment management plan which includes consideration of a range of values.
262	Silviculture for water and ecosystem health	Supports thinning for forest health and for water run-off.	2a, 2e	The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions under which implementation could proceed. Conditions include the approval of a catchment management plan which includes consideration of a range of values.
263	Silviculture for water and ecosystem health	Suggest deletion of "...managing vegetation density to enhance ecosystem health is only expected to be operationally or economically feasible over a very small proportion of the area covered by the plan" ... and that measures are identified to enable a significant amount of thinning for both water and ecosystem health.	2d	The Proposed FMP provides for thinning in regrowth stands, but depends on economic drivers, which could be markets for wood products that would be made available or the water supply. Silviculture guidelines are designed to provide ecosystem health and water benefits.
264	Silviculture for water and ecosystem health	Declining rainfall and climate change are a major issue for forested ecosystem health. Silviculture for ecosystem health/water production will reduce moisture stress in the northern jarrah forests.	2d	The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' to reduce ecosystem moisture stress and enhance resilience.
265	Silviculture for water and ecosystem health	Silviculture for water production is different to silviculture for environmental requirements and this should clearly be distinguished.	2d	The Proposed FMP provides for 'silviculture for water production' and 'silviculture for ecosystem health' and includes a management activity that specifies the conditions for implementation.
266	Silviculture for water and ecosystem health	It is irresponsible to apply the level of herbicide that will be required to carry out silviculture prescriptions in the guidelines Jarrah (2004), TA 4, Appendix 14 of the Draft plan in a Public Drinking Water Source Area (catchment).	2d	Silvicultural practices only use herbicides for approved uses, subject to relevant legislation and codes of practice.
267	Soils	There are no maps in the draft plan showing where Acid Sulfate Soils (ASS) (and potential ASS) are located. Nor are there maps showing high risk salinity areas. This is important as any disturbance resulting from logging would undoubtedly contribute to the spread of ASS and salinity; little regard is given to the dramatic changes in the water cycle that are wrought by removing native forest. Salinity is one of the most obvious problems caused by deforestation which will affect farms and the rest of the environment.	2d	The map of salt sensitivity zones is in the Draft FMP (page 79) and the map of high salt risk areas is available via the weblink in the Draft FMP (page78). Management of, and policies and guidelines about, acid sulfate soils are identified in the Draft FMP (page 71) and retained in the Proposed FMP. Results of monitoring reported in the end-of-term audit of the current FMP showed that streams in fully forested catchments remained fresh with low stream salinity. Salinity problems in agricultural areas are a consequence of clearing for agriculture on lands other than those vested in the Conservation Commission.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Comment Number	Theme	Comment	Analysis category	Response
388	Sustained yield	Does not support increase above the levels allowed under the current plan. Sustainable yield of high-quality sawlogs has declined as a result of past logging (e.g. page 14, 2nd paragraph), and is likely to decline further in future due to climate change and other influences (e.g. page 14, 1st paragraph; page 102, 10th paragraph).	2d	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP which include taking into account the effects of climate change. The process for calculating sustained yield was subject to an independent review. Historical declines in sustained yield are due to policy decisions of Government in regard to the area available for timber production.
389	Sustained yield	It is not possible to comment on the sustained yield. The elements of each scenario for sustained yield presented in the plan need to be 'decoupled'. It should be possible to apply elements of each scenario to more fully comment on this aspect of the draft plan.	2e	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. It is a combination of settings that determines sustained yield.
390	Sustained yield	Sustained yield scenario 1 should be amended to a minimum of 65,000m ³ with a preference for average annual yield of 70,000m ³ .	2e	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. It is a combination of settings that determines sustained yield.
391	Sustained yield	Lower yields and restrict cutting to higher rainfall areas.	2e	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. It is a combination of settings that determines sustained yield.
392	Sustained yield	Supports sustainable yield scenario 1. In the light of previous significant reductions in available timber resources, the vulnerability of the native timber industry to further resource reductions and Council's support for a sustainable native timber industry, Council generally supports the sustainable yield (page 106) resources available under scenario 1, however, no comment is offered on the climate change severity as this is beyond the technical expertise of the Shire. A precautionary approach is in the interest of a sustainable native timber industry offering long term resource security.	2e	The potential consequences of climate change are summarised in the Draft FMP (pages 84-86) and an appropriate, broad range of precautionary measures to address climate change is included (in various sections) in the Draft FMP and retained in the Proposed FMP. Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review.
393	Sustained yield	The timber industry cannot survive with decreases in volumes of the size suggested in the various reduction scenarios in the draft FMP, and this next FMP should provide as a minimum the same volume as set under the current FMP, if not an increase, to ensure the ongoing viability of the timber industry.	2e	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review.
394	Sustained yield	Supports lower jarrah sustained yield.	2e	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review.
395	Sustained yield	The FMP 2014-2023 needs to provide for a quality and quantity of wood to provide economic surety for the industry and opportunities for value adding.	2d	Sustained yield has been calculated and allowable cut determined based on the settings adopted in the Proposed FMP. The process for calculating sustained yield was subject to an independent review.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Appendix 2a: Summary of comments on proposed key changes

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

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

Appendix 2b: Summary of comments on proposed management options

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

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

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

Appendix 2c: Comments on sustained yield scenarios

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

Appendix 3: Summary of comments contained in pro forma submissions

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

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

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

Appendix 4: List of submitters

Name/Organisation	Name/Organisation	Name/Organisation
21125812	alan	Alistair P D Bain
23tash	Alan and Debbie Burns	Alistair Spong
A Christy	Alan Burns	Alistair Spong
A Ismailjee	Alan Jones	All Suburbs Wood Yard
A M Galvas	Alan Mason	Allan Bayne
A Spencer	Alan McGough	Allan Birrell
a.rooney	Alan Notley	Allan Boyd
aa.jones	Alan Roscoe	Allan Hughes
Aaron Magno	alanestewart	Allan Tinker
Aaron Cummings	alanmc.36	alliesw
Aaron Jackson	alastair	Allister Cash
Aaron Lindquist	Alastair Cormack	Ally Farmer
Aaron Robinson	Alastair Sherriffs	Ally Farmer
abeets	albanyj	Alma Todd
abenn	albennett82	alpersj
abolger	Aleezsia Danzi	Alsion Vangel
abpolomka	ALeita Artemis	alternativeways
acapobia	Alex Apostolou	alwood82
Access Engineering	Alex Bruce	alx4
accordion	Alex Cattley	Amanda
acdocherty	Alex Cattley	Amanda Bowen
acejane	Alex Farquhar	Amanda Hesford
acestgs	Alex Miller	Amanda Hooper
aclevana	Alex Rossi	Amanda Jane Pentreath
acre	Alex Syme	Amanda Marrett
Adam Addison	Alex Taucher	Amanda Mikalson
Adam J Hayes	Alex Tomlinson	Amanda White
Adam Jalaludin	Alex Van Maris	amanda.forrest
Adam McHugh	Alex Whisson	amanda.gunzburg
Adam Ward	alex.mercea	amanda.strano
adam.connell	Alexandercheng19	amandahuang
Adela Newnes	alexemu	amandaperlinski
adria.d.lopez	Alexis Aw	amasters
Adrian Boevé	Alexis Courtin	amay
Adrian Doran	Alfie Jamieson	Amber Faulkner
Adrian Hohn	Ali	Amber Nolan
Adrian Pottow	Alice James	ambnp
Adrian Price	alicemolomby	amrit
Adrienne Rowell	alicep	amuzubilam
Affie Nuzum	Alicia Zadeian	amy
ahaber3	alicroagh	Amy
ahanson47	alifrog	Amy Clark
AHengst1	Alillico	Amy Frost
Aidan Lego	Aline Cohen	Amy Griffin
Aideen King	aline25is	Amy Krupa
Aileen Jones	alisha	Amy Perrin
ailsa_jf	Alisha Devlin	Amy Prendergast
ailsajane6	Alison	Amy Rachow
Aimee Whitteaker	Alison Dorn	Amy Thrower
Aine Macleod	Alison Harland	Amy Warner
AJ Brentow	Alison John	amywarner
akebono69	Alison Jones	Ana Lopes
aky.kennedy	Alison Wylie	Ana Requejo
Al Shew	Alison.abdo	Ana Santos
Alan	alison1418	Ana Santos

Name/Organisation

Ana Trish Mairata
 Anabela Claughton
 and9930
 Andre Niekerk
 andre.lariviere
 Andrea Fleming
 Andrea Klek
 Andrea Bithe
 Andrea Dennett
 Andrea Georgieff
 Andrea Haster
 Andrea Pettigiani
 Andrea Ramirez
 Andrea Whiteland
 andrea.gaynor
 andrearowe2
 Andrew Adam
 Andrew Biggins
 Andrew Boulton
 Andrew Cheetham
 Andrew Flatt
 Andrew Harding
 Andrew Haskell
 Andrew Hunter
 Andrew Kelly
 Andrew Ladage
 Andrew Mortell
 Andrew Muhling
 Andrew Roberts
 Andrew Walton
 Andrew Woolley
 Andrew Worland
 andrewandsusan
 andrewbarrs
 andrewcheetham
 Andy Donker
 Andy Kurpiela
 Andy Russell
 Angehopf
 Angela Barnett-Moorcroft
 Angela Bell
 Angela Brewster
 Angela Goerling
 Angela Grant
 Angela Hine
 Angela McNabb
 Angela Skehan
 Angharad Thomas
 angie951
 angus
 Angus
 Anisha Fernandes Da Rocha
 Anita Downing
 Anlyn Murphy
 Ann Beatty
 Artemis Asproyerakas
 artgraph

Name/Organisation

Ann Breeden
 Ann Coultas
 Ann Gugler
 Ann Harvey
 Ann Howard
 Ann Ingham
 Ann Sutton Babel
 ann.anderton
 Anna Bayles
 Anna Campbell
 Anna de la Parra
 Anna Duffy
 Anna Elliott
 Anna green
 Anna Hermkens
 Anna Jackson
 Anna Kelly
 Anna Mills
 Anna Nowicki
 Anna Pearson
 Anna Steenhuizen
 anna.bowman
 anna.speight
 anna.vanderbom
 Anna26623
 Annalise Churchmond
 annalouisefontaine
 Annapal77
 anne
 Anne Andrews
 Anne Collin
 Anne Elson
 Anne Farrell
 Anne Forbes
 Anne Janes
 Anne Matan
 Anne Nicholas
 Anne O'Donnell
 Anne Pettit
 Anne Rainbow
 Anne Ross
 Anne Stewart
 Anne Velasquez
 Anne Wilson
 anne.andrews
 anne_alan
 Anneke Andries
 anneke hut
 annemaree.jones
 Annemarie Hindinger
 annette padovan
 Annette Webb
 Annie Motherway
 Annie Moyes
 Annie Otness
 Barbara Brawls
 Barbara Devine

Name/Organisation

anniemalcolm
 annieparker
 annierobinson958
 annieyoung2
 annmolloy
 annshenfield
 Anonymous
 Anonymous
 Anonymous
 Anonymous
 Anonymous
 Anonymous
 Anonymous
 Anonymous
 Anthea Balgera
 Anthony Box
 Anthony Docherty
 Anthony Heal
 Anthony Leaman
 Anthony Lynch
 Anthony Moloney
 Anthony Regan
 Anthony Ritchie
 Anthony Stewart
 Anthony Watts
 Anthony Wozencroft
 Antje Nebel
 Anton Mittram
 Anton Wirth
 Antonia Bagshawe
 Antony Day
 apa34395
 Aparna Hegde
 appetit
 apgar
 aprairieincolorado
 April Ashton
 April Wilson
 April.nutter
 aptpal
 Aquaea Marshall
 arakimov
 Aranda Morrison
 arcus
 arende
 Ariadne Macleod
 Ariadne Macleod
 Ariane Kat
 Arianrhod Thomas
 armiehen84
 aroha.aorangi
 arqwing
 Arran Lodge
 Arran Slater
 bellegroves
 bellman

Name/Organisation

artists
 arunacala
 Ary
 Asareh Manseon
 Ash Osborne
 Ashlea Wilken
 ashlee1
 Ashleigh Neale
 Ashleigh Neale
 Ashley Farr
 Ashley Prince
 Ashley Turner
 Ashlyn Haines
 asneale88
 asopao
 aspiring
 astrohoops
 ataxia77
 atho6367
 Atlanta
 au760
 audiochris
 audra
 Audrey Boom
 audreyjb
 auradora
 Aurelie Yeo
 Auri Ballantyne
 Austin Boyd
 Austin Castiglione
 Australian Furniture
 Auswest Timbers Pty Ltd
 avandale
 avenab10
 av15787
 Avril Steyl
 Aya Pigdon
 ayahuasca1976
 Ayla Hayes
 Ayla Lisson
 Aysh
 azathoth-x
 B A Steele
 B.Bingham-Gates
 B.degaris
 baker
 baldo
 baldo
 bandicoots
 barb
 Barb Jones
 barb46
 Barbara Black
 Biddy Myres
 Bill Moffett
 Bill McRostie
 bill.westerman1

Name/Organisation

Barbara Franzen
 Barbara Garwood
 Barbara Gdowski
 Barbara Knowles
 Barbara Lee
 Barbara Mansfield
 Barbara Pearce
 Barbara Pecze
 barbh
 barbspinbox
 Barni norton
 Barri Lythe
 Barri Lythe
 Barry and Janet Dufall
 Barry Farthing
 Barry Lang
 Barry Lang
 Barry Myers
 Bart Hoppenbrouwers
 bartpeters
 Batchelors
 bathunt66
 batlem
 baubina55
 Bauxite and Alumina Action Group
 baviken
 Bayden Price
 bayley
 bb07
 bbayliss
 b-bridge
 Bcandy35
 bdneville
 beaburns63
 beadsofglass
 Beate Dietrich
 beatrix.yetarsprings
 Bec Stewart
 bec.south
 becky_wallis
 becstarfishski
 bedforddale
 Bee Winfield
 beewinfield
 beila
 Belinda Corbett
 Belinda Goodale
 Belinda Ingle
 Belinda Stewart
 Belinda Turner
 belindapalmer76
 Bella Mana
 Belle Groves
 Brayden Price
 breaton
 Brenda Carlyle
 Brenda Conochie

Name/Organisation

belwin5
 Ben Caddy
 Ben Colgan
 Ben Collett
 Ben Hart
 Ben Hermann
 Ben Hoad
 Ben Johnston
 Ben Longbottom
 Ben McFarland
 Ben Mikus
 Ben Partington
 Ben Passamani
 Ben Perkins
 Ben Raynor
 Ben Stuart
 Ben Tassone
 Ben Ward
 Ben Watson
 Ben Williams
 Ben Wright
 ben.earle
 benc.integrity
 Benedict Coyne
 Benita Begley
 Benjamin Francis Coakley
 Benjamin Hillion
 Benjamin Johnson
 Benjamin Johnson
 Benjamin Pushman
 Benjamin Ranshaw
 benmag
 benstewart4
 Beren Spencer
 berna
 Bernard Elliott
 bernie
 Beryl and Les Stratford
 Beryl Francis
 Beryl Hemsworth
 Beryl Lesmond
 berylmmary
 berylmilmeray
 bestwesty
 Beth Bridson
 Beth Flatt
 Beth Randell
 Bethia Blond
 Betty Hindle
 betty.millward
 Bevan Kalleske
 bfleay
 bgparadise
 Bronwyn Lee
 bronnie
 Bronte Leddin
 Bronwen Bell

Name/Organisation

Binda J Moore
 Bing White
 Biomass Action Group
 BirdLife Australia
 birdstrike
 birdyfr74
 bishwake
 bizzylizzyl
 bjallen
 Blake Benton
 Blake Byrne
 Blake Casey
 Blake Freeden
 Blake Rawlins
 Bland
 blfrost3
 Blue Planet Society
 blueetre
 bluelotus

bluemoon
 Bluesea
 bmarchini
 Bob Douse
 Bob Dunn
 Bob Gretton
 boballie
 boboort
 bogandhi
 bonnie.gets.spammed
 bonniebarlow07
 bootsp
 bossw2006
 bousquetrb
 Boyd Emmerson
 Brad
 Brad Baldacchino
 Brad Barr
 Brad Glass
 Brad Ramshaw
 brad3735
 bradc
 Bradley Baxter

Bradley Downing
 Bradley Miller
 Bradley Mitchell
 Bradley Mitchell
 Brandon Brooksbank
 Brann James Hugh McWilliam

candjhar
 Capel Land Conservation District
 Committee
 Caprice Burrows
 Cara McGary
 Cara Stitzlein

Name/Organisation

Brenda Rule
 brenda_carlyle
 Brendan Cockman
 Brendan Fry
 Brendan Holland
 Brendan Nock
 Brendan Oakley
 Brendan O'Leary
 brendan.waddington
 Brenden Bradshaw
 Brendon Cahill
 Brendon White
 Brenna Day
 Brent Newby
 Brett Donovan
 Brett Glover
 Brett John Moss
 Brett Kirkpatrick
 Brett Needham

Brett Scourse
 Brett Slater
 Brett Spice
 Brett Waugh
 Brett Young
 brettboughton
 Bretton Stitfold
 brian
 Brian and Marion Jones
 Brian Burrell
 Brian Curtis
 Brian Green
 brian marotte
 Brian Mc Erlean
 Brian Mollan
 Brian Rees
 Brian Saward
 Brian Staite
 Brian Waldron
 Brian Woodward
 briannahille
 bridgesp
 Bridget Palecek
 Bridgetown-Greenbushes Friends of
 the Forest
 bridgetstone
 Briony Boyle
 brittik
 Brmp@iinet.net.au
 Brodie Wood

Carruthers

Carsten Wagner-Richelmann
 carvaggro666
 caryn
 Caryn Boyd

Name/Organisation

Bronwyn Winfield
 bronwynconstance
 Brooke Judson
 Bruce Hartley
 bruce.buggins
 brutuspug24
 Bryan and Hetty Elliott
 Bryan Tranter
 bryan_dawes
 brybuck
 brycenhobbs
 brylkarr@tpg.com.au
 Bryn Davies
 Bryony Edwards
 bsshore1
 budhansen
 Bunbury Wellington Economic Alliance
 bushrat
 Busi Robemo
 Busselton Dunsborough Environment
 Centre
 Butch Aitken
 butts68
 bzabbia
 C B Tilbrook
 C Bradley
 C Hoft
 C M Preller
 C Pidgeon
 cab_art
 caberrill
 cadge
 cahlisoul
 Caily Burnett
 cainlaurence
 cajungirlau
 calan-r
 Callum Cutting
 Callum Mckay
 Calum Dunsworth
 Calvin Owens
 camaroni_macaroni
 Cameron Fordham

Cameron James
 Cameron Morrison
 Cameron Power
 candc.hood
 Candice Gillam
 Candice Le Roux
 candice.LR
 Chantal smart

Chantal Terlich
 Chantelle Harvey
 chantelleclemente
 chanti

Name/Organisation

cara-anderson
 cardigan
 Caren Blair
 carisa.crockart
 Carl Kous
 Carla Hildebrandt
 Carla van Raay
 carla.vr
 Carlene Steel
 Carlo Pietrotti
 Carlos Oropeza
 Carmel Riley
 carmel.cathie
 carmelscoyne
 Carmen Rico
 Carol Adams
 Carol Appelt
 Carol Bayne
 Carol Blee
 Carol Henderson
 Carol Igglesden
 Carol Lynn
 Carol Ryles
 Carol Simmons
 Carol Warren
 carol.mallinson
 Carola Anstis
 Carole Hughes
 Carole Hughes
 Carole Perry
 Carole Peters
 Carolena Grayson
 Carolina Irivino Lozano
 Caroline Hood
 caroline.blumer
 caroline.delaisse
 caroline.stevens
 carolmundell
 Carolyn Bloye
 Carolyn Cribb
 Carolyn Hanna
 Carolyn Robinson
 Carolyn Switzer
 Carolyn Tan
 carolynandsmith
 carolyncourt
 carolyne
 carolyngt
 caromacdonald
 Chris Harris
 Chris Hodgson
 Chris Irving
 Chris Irving
 Chris Irving
 Chris Kallahal
 Chris Lee
 Chris Lee

Name/Organisation

Caryn Rance
 Carys Golding
 Cassandra Beardsley
 Cassie Wardle
 castlehow
 cat.santana
 catalinazylberberg
 Cath Ralston
 cathandmatt
 cathech24
 catheebear
 Catherine Doran
 Catherine Anderson
 Catherine de Garis
 Catherine Gaspard
 Catherine Hearle
 Catherine Hodgson
 Catherine Keogh
 Catherine MacPherson
 Catherine Ryan
 Catherine Ryan
 Catherine Slack
 Catherine TeBay
 Catherine Ziverts
 catherine.ann.car
 Cathie
 Cathie Hordienko
 cathnmeeney
 Cathrine O'Connell
 Cathryn Ross
 Cathy Borthwick
 Cathy Rees
 cathy.josephs
 cathynmeeney
 Catriona Macmillan
 caughtnee
 cazcarolwhite
 Cazzbaby85
 cazzphillips
 cenk391
 ccowan
 Cecelia Cmielewski
 Cecily Scutt
 celeste.stone
 celiagray
 cemfo
 Cern Noss
 chameleon
 Chandrika Gibson
 Claire Birtles
 Claire Botman
 Claire Firman
 Claire Maher
 Claire McKinnon
 Claire McKinnon
 Claire McKinnon
 Claire Raumaewa

Name/Organisation

Charles Edward Fletcher
 Charles Hall
 Charles Marlow
 Charles Roche
 Charles Timu
 Charlotte Sines
 Charlotte Thorns
 Charmaine Burnett
 Charmaine Myers
 CHARMED_NIGHTMARES13
 chateau-65
 chazdamaid
 Che Sutherland
 chearne
 cheeseman
 Chelsea McKinney
 Cherie Beasley
 Cherie Hindle
 cherriwa
 Cheryl Gugiatti
 Cheryl Heddle
 Cheryl Osborne
 Cheryl Sharland
 cheryl.praeger
 chezkay
 Chiara Cramer
 Chiara Pacifici
 Chicka Cattley
 Chienchu Wong
 chicken_kurry
 chinda79
 Chiyin Jheng
 Chloe Deluaulx
 Chloe Stone
 Chloe White
 chloe.a.cameron
 Chloelemann
 chndlrptr
 choice
 chookys
 Chripstophor Colley
 Chris Archibald
 Chris Bailey
 Chris Bonds
 Chris Broomhead
 Chris Brown
 Chris Davis and Diana Corbyn
 Chris Ferreira
 Chris Gillett
 Colin Potts
 Colin Svanberg
 Colin Taylor
 Colin Turner
 Colin White
 Colleen Clayden
 Colleen Czerkasow
 Colleen Hellwis

Name/Organisation

Chris Marsh
 Chris Martin
 Chris McSweeney
 Chris Muller
 Chris Sammons
 chrisdabrera
 Chrissy Sharp
 christam

 Christiane Martin
 Christie Woodlie
 Christilyn Neo
 Christina Ballew
 Christina Burki
 Christina Burns
 Christina Marcus
 Christina Ross
 christina.richardson
 christinaguy
 Christine Adams
 Christine Farrell
 Christine Griffin
 Christine Hennessy
 Christine Maddison
 Christine Robinson
 Christine Savage
 Christine Scheckter
 Christine Slater
 christine.mckenna
 christinealavi
 Christopher McAlpine
 Christopher Barrett-Lennard
 Christopher Fulham
 Christopher Payne
 Christopher Warren Gossett
 chucknet
 Cid Dare
 Cindy McCann
 City of Albany
 City of Subiaco
 cjags91
 cjandjj
 cjbkeed78
 cjo41802
 ckallahar
 ckeedy
 Claire Anderson
 Claire Barrett
 Colin Turner
 Colin White
 Colleen Clayden
 cshscomp
 cswitzer
 Cullen
 currina
 cusackmg
 cwa02620

Name/Organisation

Claire Smart
 Claire Smart
 claire.greenwell2468
 claired22
 clakwen
 Clare Caldeira
 Clare Davidson
 clare harkin

 Clare Hay
 Clare Haynes
 Clare Marquis
 Clare Pilcher
 Clare Smith
 Clare Taylor
 clare.caldeira
 Claudia C Closas
 Claudia Griffyn
 Claudia Ku
 Claudia McTaggart
 Claudia Mueller
 clementine1935
 clevett50@gmail.com
 clevings
 Cliff Campbell
 Cliff Collinson
 Cliff Muir
 climatechangewa
 Clive Nealon
 Clive Riseam
 Clyde Hutttable
 cmharman76
 cmoorhead
 cnanastas
 Cndcrime
 Coalfields Firewood
 Coalfields Transport
 Codien
 Cohen Louis Shirley
 Colene Hutchinson
 Colin Briede
 Colin Ching
 Colin Clarke
 Colin David King
 Colin Hugh Abbott
 Colin Leek
 Colin Portier
 Daniel Kennedy
 Daniel Kenworthy
 Daniel Leunig
 Daniel Meyer
 Daniel Meyer
 Daniel Millea
 Daniel Palmer
 Daniel Riley
 Daniel Soulas
 Daniel Tinning

Name/Organisation

Colleen McKenney
 Colleen McKenney
 Colleen Rankin
 Con Anastas
 Connor Tait
 Conny Morgan
 Conor Delalande
 Conor Galliot
 Conservation Council of Western
 Australia
 Constance Taylor
 Contact
 cookathome
 coolflats
 cooper.lepre
 Coralie Mills
 Corine de Man
 Corinne Bushby
 Corkill
 Corman Murdock
 Corrine Prideaux
 corrineprideaux
 Cory Coops
 Cory Park
 cosbell
 countgoose
 couyragh
 cowfish5
 cpeters
 Cracknell Family
 Craig Greer
 Craig Jones
 Craig McSharer
 Craig Phillips
 Craig Sinclair
 Craig Treanor
 craigbanisterjones
 crauton@gmail.com
 Crawford
 Cristiane Lisboa
 Cristina Cilla
 cristina.ramalho
 Cristine Lisson
 crow
 Crystal Robinson
 crystalpud
 Colin Taylor
 David Gresser
 David Hall
 David Herring
 David Heymans
 David Hughes
 David Jenkins
 David Jordon
 David Kahl
 David Land
 David Lawrence

Name/Organisation

cynamonada
 Cyndy McCann
 cynthew
 Cynthia Evans
 Cynthia Scalici
 Cynthia Warburton
 cynthiab
 D and D I Machias
 D Chapman
 D Nelson
 D P
 D Prockter
 D Singer
 D T Kidson
 d.collings
 d.goodall
 d.young
 daes.du
 dairyeff
 Daisy Niland
 Dale Danzi
 Dale Franklin
 Dale Halnan
 Damian French
 Damian Tapley
 damian62
 Damien Cockman
 Damien Fisscher
 Damien Kelly
 Damon Ormsby
 dan
 Dan Coumans
 Dan Friesen
 Dan Ryan
 Dan Stevens
 danbenforestier17
 Dane Donaldson
 dani_adventures
 dani_madzhurova
 Daniel Cowell
 Daniel Featherstone
 Daniel Gallagher
 Daniel Goodwin
 Daniel Grandini
 Daniel Hogan
 Daniel Hogan
 debbrazier
 Deborah Devitt
 Deborah Garrick
 Deborah Goddard
 Deborah Hampson
 Deborah Hodgson
 Deborah Vincent
 debra
 Debra Coombs
 Debra Gakeler
 Debra Goldsmith

Name/Organisation

Daniel Tscheuschler
 daniel.soulas
 Danielle Legassick
 Danielle Morache
 danielmarano
 danijela.glavic
 danjo_99_usa
 Danni Stingemore
 Danni Stingemore
 dannym
 Darilyn McMullen
 Darlene Jakusz
 Darren Corbett
 Darren Foster
 Darren Green
 Darren Rees
 Darren Saxon
 Darriel Colling
 daryneff
 Dave Angove
 Dave Bright
 Dave Ferguson
 Dave Fergusson
 Dave McGuinness
 Dave Osborne
 Dave Phillips
 Dave Pike
 Dave Turner
 daveandhannahao
 daveb76
 david
 david
 David Adair
 David Begovich
 David Berard
 David Box
 David Clifford
 David Cook
 David Crowther
 David Curtis
 David Curtis
 David Daniel Depiazzi
 David Forshaw
 David Free
 David Giblett
 dianara
 Diane and Gary Matthews
 Diane Burnett
 Diane Forster
 Diane Harwood
 Diane Wat
 diane_b
 dianemr
 dianentim
 Dianne Beecroft
 Dianne Hendise
 Dianne Lesley

Name/Organisation

david leif nore
 David Madden
 David Nichols
 David O'Meara
 David Parker
 David Paterson
 David Patterson
 David Petterson
 David Pollock
 David Rastrick
 David Sagar
 David Sheehan
 David Simmins
 David Stewart
 David Ward
 David Watson
 David Whalan
 David Wynne and Kathleen Chindarsi
 david.deepaterson
 david.mckay
 davidseaborg
 daw43
 Dawn and Tony Pedro
 Dawn Barrington
 Dawn Clare
 Dawn Zegledi
 Dawson Contracting
 dc.donaldson
 dcarruth
 ddouglas
 Dean Windh
 Deanna Eagger
 Deanne Osborne
 Deanne Vines
 Deb Grant
 Deb Monteith
 Deb Tabora
 deb.penney
 debaughn
 debbie
 Debbie Allan
 Debbie Elvin
 Debbie Payne
 debbie Wilkinon
 debbie.hay
 Donna Western
 donna.mazza
 donovaneb
 doody2000
 doonerhobbs
 Dorinda Kelley
 Doris Macdonald
 Doris Ruessmann
 doritherrmann
 dorotel
 Dorothy Cosgrove
 Dorothy Hannan

Name/Organisation

Debra Slater-Lee
debwaughmorivr
Declan Sharp
dedalt
deeds49
Deelan Sharp
Deidre Park
Deidre Patterson
deidrepark21
Della Rae Morrison
Dellan Sharp
delmarco
DelorenzoEnterprise
Denis Cox
Denise Woodley
denise.fernle
deniseewin

denmar1
Denmark Environment Centre
Dennis Pittendreigh
denysem
Department of Agriculture and Food
Department of Indigenous Affairs
Department of Mines and Petroleum
Department of State Development
Department of Water
Derek Cook
Derek Flemming
Des Cochrane
Des Donnelly
Des Mills
Dettra Farrell
Deverly de Rusett
Devlin Gannon
Devon Button
dew12
dgoulter
Di Tuxford
di.ellis
Diana Corbyn
Diana Holden
Diana Oliver
diana.tomkins2
Eddy Downs
edmundssf
edsall
Eduardo Cossio
edward
Edward Donato
Edward Kleingeerts
Edward Peach
Edward Pendergram
Edward Rya
Edward Sullivan
eggnogg
egorin

Name/Organisation

Dianne Moxham
Dianne Stone
dido
Diego Oliveiron
dillyjo
dimahi
dimahi
Dinah Terry
Dinda Evans
Dion Walker
Ditte Strebel
ditte_strebel
divadingo
djangol
djl
dk_needham
dmdesmoines
Doctors for the Environment
Australia
dodge_laura
Domenico Di Lallo
Dominic May
Dominique Bayens
Dominique Bayens
Dominique Chanorne
dominique76
Don Adam
Don Spriggins
Don Taylor
Donald Clark
Donald Clarke
Donelle Kidd
donmckelvey38
donna
Donna Behrmann
Donna Frizzell
Donna Livingstone
Donna O'Brien
Donna Quinn
Donna Selby
Donna Selby
Donna Simmons
Donna Sutton
Elizabeth Wood
elizabeth.lavall
elizabethohalloran
Ella Hemsley
Ellaine Lurie Janicki
Ellana Hawthorne
ellarebee
Ellen Zink
Elli Lazarov
Elliot Rigby
ellsinmr
Elly Benaim
Elly Wulkie
elpreller

Name/Organisation

Dorothy Lee
Dot Terry-Bos
dot.oliver
doterraplanet
Doug Knott
Doug McColl
Doug Willcocks
Dougall
doughiemacc
dougknott
Douglas Ashcroft
Douglas McNeill
dpakx
dragonsandy1
Drew Johnston
Drew Nicholls
dufall

duncan
Duncan Macmillan
Duncan Moon
Duncan Reilly
Duncan Reily
durnin
dv8butshy
Dwayne Price
Dylan Buckee
Dylan Jennings
Dylan Ryan
Dylan Stevens
E Acton
E L Jamieson
E Nieman
e.borie
e.lil
Eamonn Beahan
easyyogi
EC and C Butler
ecol0106
ecosustain
Ed Gould
edd
Eddie Donato
enviro
envrkimb
ereisman
Eric Brunette
Eric Christian
Eric Lawson
Eric Mc Leron
Eric Schwelm
Erica MacIntyre
Erika Coyne
erin70
Erinn Williams
Ernest Gizzarelli
Ernest John Smith

Name/Organisation

ehollams
ehoppenbrouwers
Eileen Podziuka
Elaine Allen
Elaine Allen
Elaine Oldham
elaine.bancroft
elainebecker
elanjae
Eleanor Davies
Eleanor Parker
eleanorcarney
eleanorgodfrey
Eleonora Pavlovska
elia.mcallister
Elisa Osborne
Elisabeth Bechmann
Elisabeth Trimble
Elisabeth Vis
Elisabeth Vis
Elise Fogarty
Elise White
Elise White
Elissa Pizzata
Elizabeth Antipas
Elizabeth Antipas
Elizabeth Geary
Elizabeth Gertsakis
Elizabeth Hill
Elizabeth Jack
Elizabeth Joy Kingsford
Elizabeth McFarland
Elizabeth Moore
Elizabeth Prendergast
Elizabeth Scanlon
Elizabeth Spoor
Elizabeth Troup
Elizabeth Troup
Elizabeth Verschuer

Elizabeth Verschuer
Elizabeth Williams
falconwood
Farida Iqbal
farrab01
Fay Baudains
fayely10
Federica
Fei Ngeow
Felicity Haynes
Felicity McGeorge
Felicity Thomas
felicitygresele
Felix Rosario
ferrarmt
fettesf
feytg

Name/Organisation

Elsbeth Stewart
Elsy Shallman
emailbrettcole
emb621
emcauliffe
emerald.dunn
Emily Alford
Emily Barrett
Emily Egerton-Warburton
Emily Pedlar
Emily Wheat
Emily Withers
emilya
emma
Emma
Emma Brindal
Emma Bryce
Emma Che Martin
Emma Downing
Emma Gilbert
Emma Hastie
Emma Hastie
Emma Hayes
Emma Hussey
Emma Jack
Emma Jenkins
Emma Kirkaldy
Emma Okeefe
Emma Paulin
Emma Roth-Beirne
Emma Shepherdson
Emma St Clair Ford
emma.hansma
emma.rooksby
Emma-Clare Bussell
Employees at Diamond Mill
Emskiclemski
emumenu
Enmic Pty Ltd
Enmic Pty Ltd/Lime Industries
Pty Ltd
Frans Badenhorst
fraser01
Frazziella Guerra
Fred Coles
fred08034
Freda Watkin
Freddie Williams
Freddy Simmons
Frederique Robert
freeform
freoboy
freovegan
Frida Brandon
Frida Simms
Frida Simms
frogui1964

Name/Organisation

Ernst Westergren
Esma Saikip
Esmeralda Hope
eso
estellerice
Esther Boeve
esther garvett
Esther Zamora
Esther Zamora
Esti Nagy
Etai Cohen
etaktj
ethelduk
Ethelsdatr@aol.com
Ethlynn Dewitt
Eugene Chappelle
Eva Turewicz
Evan Coumbe
Evan Litis
evapalmer
eve
Eve and Jim Parry
Evelyn K
Evelyn Lee
Evelyn Wong
evelynparry
evers
eversteg
evesfam
evis
Ewa Piasecka
Ewa Starmach
Ewan Buckley
Ewen Johnston
ewwhitehe
ezandnath
F Searl
f1_12_i3
fairydance23

Faith Buddy
Gary Schwab
Gavin Arnold
Gavin Cloake
Gavin Muthukumaraswamy
Gayle J
gaynadenby
gayreid
gdean
gdewar8
geemucci
Gelareh Khakbaz
gemma.sullivan
gen
Genevieve Bernardi
genevieve.ccg
geniusp

Name/Organisation

Fi Cowan
 Fida Haidari
 fifi1
 Fiona Cormack
 Fiona de Garis
 Fiona Gardner
 Fiona Moran
 flanagan.ray1
 Flavia Pardini
 flavia.bibby1
 Florence Charpentier
 florencec
 fluorobureau
 focuspk
 Foen Nahas
 Forest Industries Federation (WA) Inc
 Forest Products Commission
 Forest Rescue
 forsterandrew
 forsyth
 fp
 frananth
 Frances Kelcher
 Frances Stone
 Frances Wilson
 Frances Yule
 Frances Yule
 Francesca Abbonizio
 Francesca Meehan
 Franchot Rhodes
 Francis Kotai
 Francois Sauzier
 Frank Batini
 Frank Gao
 Frank Peter Mastaglia
 Frank Sabatini
 Frank Scott
 Franka Meuzel
 frankandlilian
 Frankie Heiderich
 gildedlily
 Giles Hardy
 Gillian Bowater
 Gillian Devine
 Gillian Hill
 Gina Church
 Gina Hayward
 Gina Lawley
 Gina Menzel
 Giovanetti Transport Pty Ltd
 Givlia Clifford
 Giz Watson MLC, Member for North
 Metropolitan Region
 gjmcm48
 gledhill_d
 Glen Howesmith
 Glen Kelly

Name/Organisation

frus1012
 fs_kovacs
 Fuller.helene
 G Dawson
 G Emmerson
 G Synnot
 g_ogston
 Gabby Padoron
 Gabriele Dodds
 Gabriele Gehlhaar
 Gabriella Chvojka
 Gabrielle Pennay
 gaiaearth64
 Gail Cresswell
 Gail Harnett.
 Gail Hitchcock
 Gail Le Breton
 Gail Putz
 Gail Willems
 gailcamhi24
 gajmedherb
 gallaherp
 Gandp
 ganhaar
 Gareth Thomas
 Gareth Thomas
 garicklee
 Garry Hawkes
 Garry Ogston
 Garry Schafer
 Garry Waldron
 Gary Carroll
 Gary Dowse
 Gary Ellement
 Gary Hutton
 Gary Langedyk
 Gary Maddison
 Gary McQuade
 Gary Savory
 Graeme Cook
 graeme hay
 Graeme Minitier
 Graeme Orr
 graham
 Graham Ansley
 Graham Cattley
 Graham Duncan
 Graham Frizzell
 Graham Frizzell
 Graham Hodges
 Graham Knapp
 Graham Loud
 Graham Marsh
 Graham Pearcey
 graham.bell
 grange43

Name/Organisation

Genovieve Stewart
 Geof Stagbouer
 Geoff Farr
 Geoff Hansen
 Geoff Prior
 geoff_pape
 Geoffrey Brown
 Geoffrey Herbert
 Geoffrey Suthon
 George Carmody
 George Crisp
 George Johnson
 George Kolichev
 George Pavlinos
 Georgesidoti
 Georgia Johnson
 Georgia Oliver
 Georgia Smith
 georgina byrne
 georgistone
 Gerald DeHaan
 Gerald Shepperson
 gerald.upham
 Geraldine and Robert Johnson
 Geraldine Clanke
 Geraldine Gillen
 Geraldine Mitchell
 Geraldine Mitchell
 Geraldine Thomas
 German Mendez
 Gerry Collins
 Gerry McCarron
 Gerry Rees
 getsharkware
 gfgoodwin
 ggconrad
 ghchauvin
 ghostlly
 Gilda.davies
 gunnadoo2
 Guy Jennings
 Guy Spouge
 gwen.hillman
 Gypsy Wulff
 gypsyj13
 H Christian
 H Jorgensen
 Hafizullah Haidari
 halabalou
 Halford
 Halina Emmerson
 hamer
 Hamish
 Hamish Burnett
 Hamish Morgan
 Hamish Morgan

Name/Organisation

Glen Pendlebury
 Glenda Marteene
 Glenda Marteene
 glenicela
 Glenn Hunter
 Glenn Lackey

 Glenn Michael
 glenno
 glen-young
 Glenys Darmody
 Glenys Davies
 Glenys Davies
 glorias
 glunardi
 Glynda Taylor
 gmirvine6
 gnsjcollinson
 godini.nicholas
 going_down_in_flames04
 goldee01
 goldkeyacc
 golligosh
 goodalehome
 Gordon Mathieson
 gordy237
 goulter
 gpalfreyman
 Grace Anderson
 Grace Barron
 Grace Keast
 Grace Keast
 Grace Ryan
 Graceswallow
 Gracie Jones
 gradius2
 gildedlily
 graeme
 heatherp64
 hedviglockwood
 heidi
 Heidi Hardisty
 Heidi Nore
 Heidi Shields
 Heike Motzek
 Helen Brewer
 Helen Hopkins
 Helen Johnson
 Helen Knewstub
 Helen Lawrinson
 Helen Lynes
 Helen M Turbot
 Helen McRae
 Helen Stanes
 Helen Viner
 Helena Hladio
 Helena Maoz

Name/Organisation

Grant Bachos
 Grant Ford
 grant.philippe
 grantcro
 Gray Ardern
 Greaham Gibillini
 Great Southern Development
 Commission
 Grecian Sandwell
 greenbl
 greenleafcert
 greentown
 Greg Ash
 Greg Boon
 Greg Burrows
 Greg Byrne
 Greg Franke
 Greg Kettlewell
 Greg Reynolds
 Greg Swensen
 gregatourhouse
 gregleno68
 gregorybold
 Greta Edwards
 Greta Jourdane
 greville
 grievje
 Griffin Jagoe
 griffithsdom
 grit
 grsouthern
 grubs
 gs_buller
 Guanlin Wu
 gump
 Gun Dowa
 gunjar
 houseofsavoy2000
 Howard McCoy
 howardcas
 howemeagan
 Hrimnir Benediktsson
 Hrimnir Benediktsson
 htaplin
 huckleberry_hollow
 hugh
 Hugh Chevis
 hughc
 humphreyva
 Hunter Wallof
 Huseyin A
 Iain Massey
 iamdelicate
 iamram-g
 ian
 Ian Carlisle
 Ian Chitty

Name/Organisation

Hamish Ollivier
 Hampton Partners Bridgetown
 Hannah Blair
 Hannah Hatfield
 Hannah Riordan
 Hannah Rule

 Hannah Wilkins
 Hannah Wilkins
 Hans Hoogendorp
 Harang Kim
 harcourtsmith
 Harold Boot
 harpermered
 Harriet Kater
 Harris Wood Machining
 harris.yael
 Harry Cohen AM
 Harvey
 Harvey Water
 harveyd33
 hawkins_1956
 Hayley Bulimore
 Hayley Madams
 Hayley McGlinn
 Hayley Mutton
 Hazel
 Hazel Brown
 hbarco
 hbergen
 Heath Daly
 Heath Taylor
 heathadams
 Heather Hugo
 Heather Joppek
 Heather Lesley
 heatherl
 Ines Hoffmann
 Ines Tuerk
 Ines Turz
 Inez Edwards
 infinitydorn
 info
 info
 info
 info
 info
 Inga Kamps
 Inge van Winkel
 ingleknight
 Inglewood Products Group
 Ingo Rheinbay
 Ingrid Cattley
 Ingrid Hilario
 inkset
 InMart5
 Ioanna Tzanis

Name/Organisation

Helene Kippert
helentennant
Hellen Cooke
helooksee
helsmac
hendersonhobbs
Hendrikus Vandervelden
Henrietta Vegh
Henrik Thorsen
henry
Henry Cattley
Henry Cattley
hepchet
Herbwood
Herdigan Logging
Hester Goedhart
Hester Van Zeist
hfarmer
hijjo2
Hilary Mayger
hilarynichols
hilpal
hirosz
hmg963
hobo17pollie
hoepagirl
Holdenc
Holly Balinski
Holly Bridges
Holly Buykx
Holly Cottingham
Holly Jamieson
Holly Shepherdson
Holly Stockton
hollyhast
holodeck666
Jack Brockway
Jack Bromell
Jack Kenbeek
Jack Kirkness
Jack O'Donnell
Jack Rogulski
Jack White
jackgail
Jacki Divirgilio
jackie
Jackson Lee
Jackson Pulford
Jacob McGrath
jaco
Jacque Ashworth
Jacqueline Baker
Jacqueline Carbro
Jacqueline Morrell
Jacqueline Rossouw
Jacqueline Thorn
jacqui

Name/Organisation

Ian Collins
Ian Harby
Ian Harris
Ian Henderson
Ian Hicks
Ian Hodgson
Ian Mann
Ian May
Ian Michael Rudd
Ian Morley
Ian O'Breza
Ian Overheu
Ian Patterson
Ian Petersen
Ian Robinson
Ian Rudd
Ian Telfer
Ian Telfer
Ian Viapree
Ian Whitteaker
ian.viapree1
ianf
iangc63
idodson
idwAhimsa
ilario
illingworth4
ilmahynson
imitationaussie
Imogen Bessler
inala
Inci Keleher
include1
indiansummer80
Indra Keliuotis
Jan Allen
Jan Ead
Jan Knight
Jan McCahon
Jan Modjeski
Jan Olliver
Jan Star
jan.campsite
jan60gro
Jana Soderlund
Jana Sperschneider
jandpdarby
jane
Jane Aitken
Jane Armstrong
Jane Chambers
Jane Clarke
Jane Cousins
Jane Davis
Jane Duncan
Jane England
Jane Greenwood

Name/Organisation

Iona Kentwell
Irene Apap
Irene Peach
Irene Perkoulidis
Irene Schmutz
irenecunningham
iris
isa.leclez
Isaac Beales
Isaac Ray
Isabela Godden
Isabella Beaton
Isabella Jennings
Isabella Moore
Ishbel Adey
ivanlim.ws
ivoletica
ivymcd
J Asquith
J D Heggard
J G Nelson
J Paton
J Robso
J Thomson
J Timmers
J Williamson
j.cummins
j.roach2
j.sky
j.twentyman
j.walsh
jaalbury
jaalbury
jacinta_dalton
Jack Bradshaw
Janice Lim
Janine Erskine
Janine Garner
Janine Simpson
Janine Ward
Janis Meyers
Jann Lane
Jann Lane
janselmi
jared_pedro
jarrah
Jarrahdale Forest Protectors
jarrahjarrah
Jarrahwood Australia Pty Ltd
jarred_pedro
Jarrod Caldwell
jas1953
jaseinny
Jason Alexander
Jason Barnes
Jason Bird
Jason Braithwaite

Name/Organisation

Jacqui Barnsley
 Jacqui Goodman
 Jacqui Johnson
 Jacqui Mooney
 Jacqui Surendorff
 Jacquie Ashby
 Jade Bloxside
 Jade Torrisi
 jade.herwig
 Jael Johnson
 jag4848
 Jaime
 Jaimee.coombs
 jajenks
 Jake
 Jake Scholes
 Jake Stone
 Jaki Baxter
 Jaki greenfeld
 jakobboyle
 Jakub Pyrehla
 jamelaflly
 James Anderson
 James C Matan
 James Cranfield
 James Hansen
 James Mathan
 James McAlinden
 James Murdock
 James Pardoe
 James Wharton
 Jamie Dye
 jamie.holland
 jan
 Jeanne Wilcox
 jeannepickering
 Jean-Paul Orsini
 Jeff and Debbie Barham
 Jeff Osborne
 Jeff Stewart
 jeffb
 jeffdom
 jelavila
 jemboyd
 Jen Gill
 Jen Newlands
 Jen Pearce
 Jen Warner
 jenemi51
 Jenna Ridley
 Jenni Scott
 Jennidavie
 Jennie Connolly
 Jennifer Anne Wapsley
 Jennifer Barter
 Jennifer Bertenshaw
 Jennifer Brett

Name/Organisation

Jane Hockin
 Jane House
 Jane James
 Jane Jarvis
 Jane Leahy-Kane
 Jane Matthews
 Jane Neve
 Jane O'Halloran
 Jane Parker
 Jane Robertson
 Jane Roberts
 Jane Taylor
 Jane Walter
 jane.russell98
 janekcannon
 Janelle Sommerville
 Janelle Veitch
 janeralls
 Janet Forman
 Janet Gannon
 Janet Grogan
 Janet Groonan
 Janet Juniper
 Janet Karson
 Janet Marsh
 Janet Pettigrew
 Janet Pheloung
 Janet Steven
 Janet Vost
 janetinperth
 janetmayer
 Janice Dlugosz
 Janice Fawcett
 Jerry Coleby-Williams
 Jerry Gistis
 Jess Amy Baker
 Jess Beckerling
 Jess Butler
 Jess Higgs
 Jess Macfartane
 Jess Mason
 Jess Mathews
 Jess Prince
 Jess Ray
 Jess S
 Jess.bridges84
 Jesse Ellement
 Jesse Young
 jesseгоре
 jessehumphries
 Jessica Berry
 Jessica Dyer
 Jessica Macfarlane
 Jessica Masson
 Jessica Rawnsley
 jesyms
 Jewels Auburn

Name/Organisation

Jason Brown
 Jason Coutts
 Jason Denham
 Jason Genomi
 Jason Horlock
 Jason Kendrick
 Jason Skippings
 Jason Swiney
 jason.boudville
 jasangreen78
 Jaxon Pillage
 Jay Klinac
 Jay Whitman
 Jaya Vaughan
 Jayden Young
 jaylin
 Jayne Mackenzie
 Jayson Beaumaster
 jazzjt
 jazzjt
 Jbhogan
 jbnbb
 jdamave
 jdbaas
 jdunn936
 Jean Barrera
 Jean Cheesman
 Jean Foster
 Jean Le Quesne
 Jean Le Quesne
 Jean Luke Ah Weng
 Jean Muthukumaraswamy
 Jean-Luke Ah-Weng
 Jjohn Fowler
 Jkboudville
 jkwhigh
 jlcmgl
 jldodds
 jlhaynes
 jlyleoco
 jmaizel
 jmartdav
 jmhoward
 jmihalek
 jmiller-berry
 jnaples
 jnewsome1
 jo
 Jo Coveney
 Jo Coy
 Jo Daniels
 Jo Dilly
 Jo Dodd
 Jo Dormer
 Jo Gunning
 Jo Holland
 Jo Jennings

Name/Organisation

Jennifer Bryant
 Jennifer Bryant
 Jennifer Casotti
 Jennifer Cornell
 Jennifer Hanson-Birch
 Jennifer Hanson-Birch
 Jennifer Henderson
 Jennifer Hood
 Jennifer Hunt
 Jennifer Lynn
 Jennifer Mills
 Jennifer Scott
 Jennifer Stevens
 Jennifer Viol
 jennigrace
 Jenny Al
 Jenny de Garis
 Jenny Franklin
 Jenny Griffyn
 jenny Patterson
 Jenny Sullivan
 Jenny Vassallo
 Jenny Wright
 Jenny Xiuhua Chen
 jennymoyle
 jennynorton
 jeremy Ball
 Jeremy Boulton
 Jeremy Fisher
 Jeremy James Vaux
 Jeremy Vaux
 Jerome Keightley
 Joe Savage
 Joel Skippings
 Joel Skippings
 Joeline Charles
 joeylynne
 jogb96
 Johanna Eaton
 Johannaevans
 Johannaevans
 John A Jamieson
 John Abbott
 John and Louise Clarke
 John Anselmi
 John B Tate
 John Bailey
 John Blunt
 John Bornatici
 John Bowman
 John Braynzeed
 John Brian Boulton
 John Butcher
 John Clack
 John Clarke
 John Coleman
 John Coleman ND

Name/Organisation

jeyses1
 jgibbs75
 jgpepper
 jhlewing
 jhole2
 jhrose
 jhrose
 Jill Duncan
 Jill Fisher
 Jill Lyons
 Jill True
 jill.elderfield
 Jillian Taylor
 jillpyvis
 Jim Dalton
 Jim Duffield
 Jim Dugmore
 Jim Matan
 Jim Shi
 Jim Underwood
 Jim Waghorn
 Jim Williamson
 Jim Williamson
 Jim Williamson
 Jim Williamson
 Jim Williamson
 Jimandmeliss
 Jimmy Lee
 jimvalentine1
 Jinhua Lin
 jjmford2
 John Thew
 John Vukovich
 John Vukovich
 John Vukovich
 John Wegger
 John Windley.
 john.cuthbert
 john.dowson
 john.mccarten
 john_wood2
 johncevasco
 johneast737
 johnhill
 johnhillk
 Johnmck
 Johnny Syu Yong Chiang
 johnrichkus
 johnsdaw
 JOIN
 jojeremy
 jojogunning
 jokin
 Joly Aurore
 Jolyon Elliott
 jon
 Jon Challen

Name/Organisation

Jo Ludbrook
 Jo Pearmine
 Jo Stewart
 jo.ascott
 jo_bower
 Joakworm
 Joan Barbour
 Joan Payne
 Joan Petroboni
 joanmcallister
 Joanna Blundell
 Joanna Burgar
 Joanna Hunter
 Joanna Wiese
 joanna.watts
 joannam
 Joanne Cowgill
 Joanne Homer
 Joanne Ipock
 Joanne Svanberg
 joburgar
 Jocummins
 Jodi Humphreys
 jodi.Catling
 Jodie Hornum
 Jodie Hornum
 jodiekolts
 jodie-moffat
 Jody Whalan
 Joe Porter
 Joe Porter
 jpickles58
 jpillsbury
 jpstolten
 jryan9
 jsheils
 Juanita
 Jude Kennedy
 jude51
 Judecu
 judit_au
 Judith Armstrong
 Judith Beer
 Judith Childs
 Judith Cohen
 Judith Durnin
 Judith Gartrell
 Judith Kay Beer
 Judith Odgaard
 Judith Smith
 Judith Trembath
 judy
 Judy Blyth
 Judy Roach
 judy.clarke
 judymor
 Juergen Rieger

Name/Organisation

John Durham
 John Evans
 John Haynes
 John Kemp
 John Kusinski
 John La Veglia
 John McCallum
 John McKinney
 John McMullan
 John McNess
 John Meachem
 John Meachem, Bruce Beggs and Phil Shedley
 John Newman
 John P Mitchell
 John Pratt
 John Purdom
 John Riddington
 John Ryan
 John Saunders
 John Schreuders
 John Seal
 John Southalan
 John Spoor
 John Steponaitis
 John Stone
 John Szylejko
 John Tate
 John Taylor
 John Taylor
 Julie Windley
 Julie Young
 Julien Kaven Parcou
 Juliet Harrop
 Juliet Johnson
 julietmaree
 Juliette Borri
 Julius Cutts
 julwood
 jumbucker
 June Shepperson
 june.jenkins
 Justin
 Justin Chidlow
 Justin Marding
 Justin Stahl
 Justin.grimm
 Justine Davis
 Justine Hooper-Buttery
 Jyantunovich
 K
 K Elrick
 K J Patterson
 k.beckmann
 k_andarmani
 k_jose78
 Kadin Wilson

Name/Organisation

Jon Godden
 Jon Singleton
 Jonah David Wikaira
 Jonathan Cousins
 Jonathan Epps
 Jonathan Free
 Jonathon Strzina
 jonowland
 Jos Hall
 Josan Moss
 Joseph Alan Slater

 Joseph Figliuolo
 Joseph Tierney
 Joseph Wh
 Josephina Cockman
 Josephine Shaw
 Josh Sasai
 Joshua Donellan
 Joshua Hobby
 Joshua Jackson
 Joshua Saunders
 Joshua Tjioe
 joshulstrup
 Josie Collins
 jotayart
 Joubert Anel
 Jowin de Ruiter
 Joyce Robinson
 Karl
 Karl G Gibson
 Karl Leunig
 Karley Winspear
 Karrie Pearce
 Karun Couper
 Karyn Thomson
 kasy
 Kate Biondo
 Kate Campbell-Pope
 Kate Creed
 Kate Houghton
 Kate Nichols
 Kate Vlcek
 kate.brealey
 kate.mcgeachie
 kate_devoy
 katelondon83
 Kath Giblett
 Kath Grimbley
 katherinefelixnash
 Kathleen Kemp
 Kathleen Mawer
 Kathleen800
 Kathryn Richards
 Kathy Damm
 Kathy Nix
 Kathy Petterson

Name/Organisation

jujuceepine
 julescolsau
 Julia
 Julia Carruthers
 Julia Grant
 Julia Lang
 Julia Lang
 Julia Waller
 juliamariehumphreys
 Julian Freeman
 Julian May

 Julian Sharp
 Julie Bessant
 Julie Butler
 Julie Carrick
 Julie Clifford
 Julie De Campo
 Julie Gossage
 Julie Griffith
 Julie Hannaford
 Julie Kingswood
 Julie Neill
 Julie Payne
 Julie Schampel
 Julie Skinner
 Julie Todter
 Julie Watts
 Julie Watts
 keely12
 keeva.verschoor
 keiche2
 keifrau
 Keith Colley
 Keith Glover
 Keith Kingsley
 Keith Moore
 Keith Randall
 Keith Rockliffe
 Keith Thomas
 keithm2576
 Kelda Free
 Kelli Liva
 Kelli Riemer
 Kellie Patton
 Kellie Williamson
 kelliemc
 Kelly Bobridge
 Kelly Crossley
 Kelly Darragh
 Kelly Delaine
 Kelly Fox
 Kelly Rae
 kelly.baulch
 kellyjones
 kellysp
 Kem Austin

Name/Organisation

kagtrip
 Kaiden Valli
 kakadukerry
 Kallena Kucers
 Kara Lach
 karagranville1
 Karen Abbott
 Karen Childs
 Karen Dugmore
 Karen Eagling
 Karen Gordon
 Karen Kelly
 Karen Majer
 Karen Mayes Smith
 Karen McKeough
 Karen McKeough
 Karen Oborn
 Karen Paull
 Karen Peralta
 Karen Taupin
 Karen Warner
 Karen Winnett
 Karen Wittcomb
 karen.rooksby
 Kareni5181
 karenoliver19
 karenwarner
 Karinne Fisher
 Kerry Riebau
 Kerstin Beckmann
 kevin
 Kevin Ashcroft
 Kevin Chapman
 Kevin Frizzell
 Kevin John King
 Kevin McLeod
 Kevin Schaffer
 Kevin Snow
 Kevin Tierney
 kevin.schaffer
 kevinandtheresa
 kevingoodwin
 Kezzabell Snowdon
 kgersch
 kgrier
 Khatijah Inayat-Hussain
 khaverka
 khaverka
 khorton
 Khwaja Mohiuddin
 Kieran Bindahneem
 Kieran Cupples
 Kieran Reid
 killself5150
 kim
 Kim and Darren Snedden
 Kim Brackman

Name/Organisation

Kathy Reeve
 Kathy Samulkiewicz
 Kathy Wreford
 Katie Barlow
 Katie Beros
 Katie Kammann
 Katie Lavers
 Katinka Ruthrof
 katrin.menard
 Katrina Zeehandelaar
 katrina.witham
 katrinamarshall23
 katspirit13
 Katy Steed
 Kay Hearn
 Kay Littlecott
 Kay Morozumi
 Kay Prowateer
 kaybarrow
 Kaye Tazing
 kaylamackinnon
 Kayleigh Williams
 kayleigh.lowe
 Kaylin French
 kbrinfield
 kdvsd
 keeley Gady
 koljen
 Koppers Wood Products Pty Ltd
 Krista Etheridge
 Kristi McMullan
 Kristie Crawford-Ferguson
 Kristiina Tabur
 Kristin Jones
 Kristin Jones
 Kristin Warren
 Kristine
 kristinwomack
 Kristy Baird
 Kristy Caruso
 kristy.forche.baird
 kristybrain
 kruszynski.j
 Krystina Myhre
 kstick35
 ktnrobbo
 ktoo
 Kuan Chou Lai
 Kurren Smith
 Kurt Frees
 kwiley16
 kwils00000
 kwylie
 Kyle Baker
 Kyle Cutts
 Kyle Raper
 Kylie Garde

Name/Organisation

Ken and Gloria Melvin
 Ken Elson
 Ken Irwin
 Ken Kelly
 Ken Rouw
 Ken Rouw
 Ken Wylie
 kenandanniesteele
 kencochrane
 kendal
 Kendal Becu
 Kendall
 kenlucas
 Kenneth Lapointe
 Kenneth Price
 Kenneth Rowe
 kent_ee
 kenyanbabe
 Keri James
 Kerrie Cole
 Kerrie gibson
 kerrie.unsworth@uwa.edu.au
 Kerry Beros
 Kerry Deacon
 Kerry Firkin
 Kerry Firkin
 Kerry Holland
 lampard1312
 Lance Banister-Jones
 Landcare SJ Inc
 lapskia
 Laraine Winn
 Larna Milford
 Larri Nead
 Laura Arrowsmith
 Laura Cargill
 Laura Elkin
 Laura Healy
 Laura Liddell
 Laura Swarbrick
 Laura West
 laura.elkin3
 laurajcannon
 Laurel and Michael Ellis
 Laurel Cockman
 laurel_sutcliffe
 Lauren Arcus
 Lauren Skender
 Lauren Walter
 Laurence Mather
 Laurie Maiolo
 laurie_sinagra
 laverscapel
 lawrance
 Lawrence
 Lawrence Crowley
 Lawrence Green

Name/Organisation

Kim Buggins
 Kim Hames MLA, Member for
 Dawesville
 Kim Lever
 Kim Logue
 Kim Minos
 Kim O'Meara
 Kim O'Meara
 kim.neil
 Kimberley Wilde
 Kindelle Pillonel
 kingia
 Kingsley Faulkner
 Kingsley Motel
 Kingsley Waterhouse
 Kirshen Eliot
 Kirsten Cole
 Kirsten Hay
 kirstine
 Kitsiki Desilva
 Kitty_bo
 Kjspurge
 kjsvgriffiths
 Kmarrs
 kmorris
 kobblestones
 Leeann Wigley
 Lee-anne Harlow
 Leeanne Tollett
 leedewing
 leejoyce
 Leemo1952
 Leesa Cadwell
 Leesa Foan
 leestubbs
 leesyinton
 leettierarga
 Leeuwin Environment
 Lefki Kailis
 lehani
 Leisa van der Linde
 Leisha Jack
 Leisha Jack
 Leith Maddock
 Leith Maddock
 Len May
 Lennard Delandgrafft
 lenny Druskovich.
 Leo Kerr
 Leo Shaolin Wu
 Leon Rozendaal
 Leone Pitman
 Leonie
 Leonie Cowan
 Leonie Higgins Noone
 Leonie Inger
 Leonie Lentjes

Name/Organisation

Kylie Tizard
 kylieblack1
 kylieburgess1
 kyliedawke
 Kym Hogan
 Kym Mohylenko
 L Bulloch
 L Dolzan
 L Frayne
 L Harrison
 L Harvey Strack
 L J Bradley
 L N Kilpatrick
 L Pember
 L van der Maesen
 L van der Maesen (Leonie)
 l.pilcher1
 Laarni Coles
 labrooy
 labrsb
 Lachlan McKenzie
 Lacoster Mytrille
 lakshmi Guruparan
 lalao6
 Leslie Sharlock
 lesmon
 lesteraj
 Letitia Stone
 lewis.odonnell
 LexySmoker
 Liam Casserly
 Liam Wilde
 Lianne Brown
 Libby Mattiske
 Libby Pappas
 Liddell Williams
 Lidia Huljich
 lil_alicat
 Lilith Fair
 Liljana Marsanic
 Lily Chrywenstrom
 Lily Cullinan
 lily.chrywenstrom
 Lilyho
 Lina Rossi
 lind0166
 Linda Beresford
 Linda Bescrypt
 Linda Cooper
 Linda du Boulay
 Linda Hall
 Linda Herridge
 Linda Holland
 Linda Ing
 Linda Jackson
 Linda Johnson

Name/Organisation

lawrkw
 Layla Henderson
 lbraun
 ldaw
 ldcadden
 Lea Cutting
 Lea Tabur
 Leah Acaon
 Leah Cheary
 Leah Coutinho
 Leah Curo
 Leah Keegan
 leah mcgovern
 Leah Mitchell
 Leah Wood
 leahk
 Leanne O'Farrell
 lebri09
 Lee Anne Groenewegen
 Lee Baker
 Lee Collis
 Lee Dhepnoorat
 Lee Warburton
 lee.green79
 linzimcnab
 Lionel Jones
 Lisa
 Lisa Celeste
 Lisa Barry
 Lisa Beebe
 Lisa Doyle
 Lisa Gibson
 Lisa Hamilton
 Lisa Hammermeister
 Lisa Hills
 Lisa Mahoney
 Lisa Mayer
 Lisa Peace
 Lisa Porter
 Lisa Rossi
 Lisa Russell
 Lisa Szczesny
 Lisa Wheeler
 Lisa Williams
 Lisa Wray
 lisacollyer
 lisaf7
 lisakit
 lisalpillinger
 list
 lists
 livingoil
 livingpictures
 liz
 Liz Allison
 Liz Appelt

Name/Organisation

Leonie Tan
 Leonie van der Maesen, Researcher
 Geomorphology, Department of
 Physical Geography, Faculty of
 Geosciences, Utrecht University
 leoniestar
 leonsong88
 leroy6
 Les Roberts
 Leschenault Timber Industry Club –
 Bunbury
 lesjohnb
 Lesleigh Curnow
 lesley
 lesley
 Lesley and Wayne Combo
 Lesley Burridge
 Lesley Dewar
 Lesley Dewar
 Lesley Judd
 Lesley Munro
 Lesley Munro
 Lesley P Walsh
 Lesley Padley
 loomshop2
 lorenzameneghini
 Loretta do Rozario
 Loretta Harnarine
 Loris A Skinner
 Lorrae Loud, Lamp Inc
 Lorraine Miloro
 Lorraine Toone
 Lorraine Toone
 lorraine.dorn
 lorrie.griffin
 lostpoetjj
 lotusland
 loubaxter
 louells27
 Louis Beckerling
 Louis de Kock
 Louisa Wise
 Louise Berry
 Louise Brennan
 Louise Cooke
 Louise Hopper
 Louise Kingston, Access Engineering
 Louise Leigh
 Louise Minty
 Louise Sales
 Louise Southalan
 Louise Woychesko
 louisebruce
 lovelots88
 lowlands4
 Irrysgl
 lselvey

Name/Organisation

Linda Kell

 Linda Plumstead
 Linda Seamons
 Linda Shewan
 Linda Skinner
 Linda Temperton

 Linda Veloskey
 Linda Watson
 lindafrd
 Lindagrann
 lindaskrolys
 Lindemann
 Linden Quin
 Lindsay Stephens
 Lindy Mae Frayne
 Lindy Precious
 lindystacke
 link_franklin
 Linley Batterham
 Luke Wallace
 lukegwheat
 lukesimmonds
 luntj
 Ivanstien
 lwsimmons
 Lydia Garvey
 Lydia Garvey
 Lyle Taylor
 Lyn Harding
 Lyn Serventy
 Lyn Walters
 Lynda Woodhams
 Lynda Blum
 Lyndal Gallaway
 Lyndall Hewitt
 lyndanz
 Lyndon While
 Lyndsay Humphries
 Lyndy Wiese
 lynes
 lynes
 Lynette Chen
 Lynette Hebiton
 Lynette Hellier
 Lynette Kearsley
 Lynette Watson
 lynmcd
 Lynn Dean
 Lynn Gauntlett
 Lynne Brough
 Lynne Dixon
 Lynne Tinley
 lynnebrs54

Name/Organisation

Liz Edwards

 Liz Hines
 Liz McGilligan
 Liz Nichols
 Liza-Jane Elliott
 lizguth1

 lizmcneill
 lizmosis
 lizpaul
 lizziefinn
 lj.waters
 ljchristophersen
 lkloost
 lmjor
 Logan K Howlett
 lois
 Lois Alexander
 Lola Levingston
 lomuland
 Madeline (Simone) Llewellyn
 Madeline Cowie
 Madhu Murali
 magart2j
 Maggie Lever
 Maggie Whittle
 maggie_davidson
 magixan05
 magnumopus
 magnus
 magpj8
 Maik Schaffer
 Maizie Jamieson
 Maja Arsic
 Maja Botschinsky
 Mal Reynolds
 Malachi Krauth
 Malcolm Mortimer
 Malcolm Harold Best
 Malgorzata Basinska
 mandy grimwood
 Manjimup Engineering
 Manjimup Visitor Centre
 Manset Storey
 mantack
 Manuel Jacob
 mappelt
 Mara Pelss
 mara__day
 maras433
 Marc Huber
 Marc Nesbitt
 Marc Oszka
 Marc Schoenberg

Name/Organisation

Luba Ryder
 Luba Sanderson
 lucia10
 Lucie Labrecque
 Lucinda Campbell
 Lucky Mladineo
 Lucretia Ramsay
 Lucy Simon
 Lucy Snowden
 Lucy Taylor
 Lucy van Kessel
 Luigi Parolin
 Lukas Rynkiewicz
 Luke Bannister
 Luke Boevé
 Luke Ellison
 Luke Hartley
 Luke Hill
 Luke Keppel
 Luke Rutherford
 Luke Rutherford
 Luke Stockwell
 margaret.wilkes
 margaretkalamunda
 margaretmarydejong
 margbow5
 margerycoffey
 margifarq
 Margmcmahon
 margtes
 Marguerite White
 Maria McAdam
 Maria van der Klundert
 Mariah Bailliant
 marian
 Marian Brown
 Marian Giesbers
 Marianne Wilson
 mariannehall
 marianneinsydney
 marie
 Marie Coles
 Marie Klarich
 Mariea Crabbe
 Mariea Crabbe

 marieljm1961
 Marianne Hodgson
 marikahaase
 marilyn
 Marilyn Newman
 Marilyn Phipps
 marilyn.wicke
 Mario Derilo
 Mario Palandry
 Marion Treasure
 Marion Cullen

Name/Organisation

Lynnette Meechan
 Lynsey J Chambers
 M
 M Andrus
 M Duvdevani
 M Gilbert
 M Jamieson
 M Leszczynski
 M P
 M Scorer
 M Stirling
 M Wilson
 M.m.eaton88
 m.uljee2
 mackay.gs
 macropodology
 Madalena Grobbelaar
 Maddie Miles
 Maddie Watson-Reeves
 maddirixcullen
 Madeleine Bush
 Mark Harrison
 Mark Horner
 Mark Hutchins
 Mark Jarvis
 Mark Jenkins
 Mark Lee
 Mark Maez
 Mark Norman
 Mark Parker
 Mark Parre
 Mark Phillips
 Mark Randell
 Mark Russell
 Mark Selmes
 Mark Staite
 Mark Steinward
 Mark Swee Ping Tan
 Mark Warry
 Mark Wearne
 Mark Westlake
 mark_anthony_allen
 Marketa Reifoua
 markhackleton
 Markus Bessler
 Marleen Buizer, Annora
 Longhurst and Stan Stochacki
 Marlene.Mayhew
 Marlon Schoep
 marra
 marrihills
 Marshall Blight
 Marshall Willan
 Marta Sandberg
 martasandberg99
 Martha Cattley
 Martha Clemen

Name/Organisation

Marc Whiteland
 Marcia Hicks
 Marcin Glowacz
 Marco Ritz
 Marcus Good
 Marcus John
 Maree Pavlinovich
 Marga Joy
 margalm
 Margaret Armstrong
 Margaret Awty-Jones
 Margaret Donovan
 Margaret McLean
 Margaret Morgan
 Margaret Owen
 Margaret Owen
 Margaret Roeterdink
 Margaret Scorer
 Margaret Spray
 Margaret Wilson
 Margaret.Gollagher
 maryback
 maryettling
 Maryfairynol
 Mathew John Woods
 Mathew Woods
 Mathilde Bernard
 Matilda Beales
 matsudat
 Matt Anderson
 Matt Aspland
 Matt Cal
 Matt Cal
 Matt Calpakdjian
 Matt Crawford
 Matt Fuller
 Matt Price
 Matt Schlapfer
 Matt Young
 matt.lemeur
 matt.willson
 Matthew Barnes
 Matthew Bennett
 Matthew Crowe
 Matthew Duncan

 Matthew Grimbley
 Matthew Grimbley
 Matthew Hancock
 Matthew Hughes
 Matthew James Pierce
 Matthew Le Meur
 Matthew Le Meur
 Matthew Madson
 Matthew Murray
 Matthew Pierce
 Matthew Rainbow

Name/Organisation

Marion Goedhart
 Marion Howman
 Marion Outram
 marion.ferguson
 marionoke
 marisa1
 Marita Mason
 mark
 mark
 Mark Allen
 Mark Armstrong
 Mark Arnold
 Mark Balow
 Mark Beal
 Mark Best
 Mark Cantlon
 Mark Daley
 Mark Dix
 Mark Glass
 Mark Gregory
 maxine.synnot
 May Ali
 Maya Spannari
 mayC
 maydaymayday
 May-Ring Chen
 mbaumanis
 mboland
 mbun_no1
 mca
 mcavoyb
 mc-birch
 McCabe
 mcelroy1
 mcgov
 mcmaster38
 mdandrea
 mdorchard
 Meagan Smart
 Meaganparry
 Meave
 meblakey
 Meg Honeyfreid
 Meg Littlejohn
 meg_packer
 Megan Andrews
 Megan Packer
 Megan Sheard
 Megan Someone
 megandugmore
 Meggan Jack
 megsnbuddha
 Meike Marks
 mel
 Mel Lin
 Mel Tucker
 Melania Padilla

Name/Organisation

Martha Vojtko
 Martin Macmillan
 Martin Pritchard
 martin.oliver2323
 Martina Manning
 Martyn Farrand
 Ma-ru Contreras
 Mary Ann Rath
 Mary Dillon
 Mary Eaton
 Mary Frith
 mary.furlong
 Mary Irwin
 Mary Truelove
 Mary Verstegen
 Mary Verstegen
 Marya Beres
 maryb63
 maryback
 Meredith Epp
 Meredith Stanton
 Meredith Williams
 merimaam
 merlfitz
 Merlin Cornish
 merron
 merry
 Merv Podzuika
 Mervin Podziuka
 Mervyn Warren
 Meryl Pinque
 mewolters
 mganatta
 mgstephen
 mhar1396
 mhodza
 mhussenbux
 Mia Trujillo
 mia.pepper
 Micahel O'Brien
 Michael Bayliss
 Michael Biggers
 Michael Bobridge
 Michael Boulter
 Michael Brameld
 Michael Bretz
 Michael BATTERY
 Michael Cloake
 Michael Cockman
 Michael Cook
 Michael Crawley
 Michael Curran
 Michael Curran
 Michael D'Andrea
 Michael Day
 Michael Dodds
 Michael Dods

Name/Organisation

Matthew Skellett
 Matthew Stroh
 Matthew Tylor
 Matthew Waters
 maui
 Maureen Dolan
 Maureen Mccrae
 Maureen Rodgers
 Maureen Rose
 Maureen Rowell
 maureen_pisani
 maureenellencass
 maureenmalone
 Maurice De Boen
 Maurie Givan
 mawby
 Maxine Butcher
 Maxine Cassidy
 Maxine Hill
 michaelrosenbrock
 Michala Mann
 Michel Guidet
 Michele Davey
 Michele Kiiveri
 Michele Kwok
 Michele Payne
 michelelouise13
 michelemadigan
 Michelle
 Michelle Becsi
 Michelle Braunstein
 Michelle Calpakdjiani
 Michelle Hunter
 Michelle Kennedy
 Michelle Lesmond
 Michelle London
 Michelle Passmore
 Michelle Poulton
 Michelle Rachow
 Michelle Reitmajer
 Michelle Reitmajer
 Michelle Rodgers
 Michelle Ryan
 Michelle Sheridan
 Michelle Stonehouse
 Michelle Trainer
 Michelle Yeomans
 michelledenise
 michelleeames
 Mick Abberley
 Mick Brazel
 Mick Gledhill
 mickgill
 Mieghan Bruce
 miekebourne
 mifmaf
 Miguel Ramos

Name/Organisation

melanie
 Melanie C
 Melanie Davies
 Melanie Williams
 melda
 Meleisha Exon
 Melinda Glover
 Melisa Gregory
 Melissa Baylis
 Melissa Colin
 Melissa Forbes
 Melissa West
 melissa.brave
 melissa.clarke
 melissakingraham
 meltrudgen
 Menkit Prince

 mindzeye
 Mingqiang Wu
 Minnie Robinson
 Minyion Swartz
 Mira Cohen
 Miranda Humphreys
 Miriam Brooker
 Miriam Brooker
 Mirne Derks
 Miroslav V
 missvicki
 missy5588
 mistressmadrigal
 Mitch Carre
 Mitchell Rose
 Mitchella Hutchins
 mitchener1
 mjcobbett
 mjgilmor
 mjhulme
 mjwatson1
 mkeane
 mlpaul
 mmmisk
 Moira.denis
 Molly O'Neill
 Mon Chamoun
 Monica Cicconi
 Monica Gauci
 Monica Katillaa
 Monika Glowacz
 monimain
 Monique Decortis
 moonrthm
 moons1
 moralana
 morgan3034
 Morma Lee
 movo

Name/Organisation

Michael Golding
 Michael Harrison
 Michael Hassett
 Michael Kiernan
 Michael Leers
 Michael Lush
 Michael Mackie
 Michael McCarthy
 Michael Reid
 Michael Scaini
 Michael Shanley
 Michael Shmuel
 Michael Stone
 Michael Taylor
 michael.bellman
 michael.kluttig
 michaelpauly1
 my5
 Myan Du
 mykoalas
 Myra Boevé
 myrtaceae
 N Schmitt
 n.herbert
 N.Stephens
 Nadia Glaizner
 Nadia Schrilling
 nadiagooding
 nadinadji
 nadine_obrien
 nads_186
 naia
 Nakita Rose
 Nalda Searles
 Nancy Dowling
 Nancy Jones
 Nancy Lorenz
 NancyNeumann
 Nannup Timber Processing
 nanutara
 naomi
 Naomi Apanah
 Naomi Bannister
 Narelle Jolley
 Narelle O'Brien
 naso222
 Natalie
 Natalie
 Natalie Bell
 Natalie Bell
 Natalie King
 Natalie Raymond
 natalie.lees
 natalie.publicis
 Natasha Busher
 Natasha Bussell
 Natasha Heath

Name/Organisation

Mika.leandro
 Mikayla Spinks
 mikayla.greisbach
 mike
 Mike Armstrong
 Mike C
 Mike Greenacre
 Mike Masters
 Mike Mccall
 Mike Neunueber
 Mike Wylie
 mike.mcglynn
 mikeybretz2000
 mikmarg
 Miles Robinson
 miles.noel
 milorocksxox
 Neil Hyde
 Neil Littlejohn
 Neil Marlow
 Neil McWilliams
 Neil Selkirk
 Neil Wallace
 Neil Whiteland
 neilclare
 Nelly Maarssen
 nelly_p5
 netizat
 neuroewire1
 Nev and Judy Teakle
 Neville Weir
 Neville Wren
 Newton Smith
 nexxial
 ngauger
 ngrace
 Nguyen Thi Hang
 nh_hooge
 Nhanov Sirios
 nhanson48
 nhaymann
 Niall Taylor
 Nic Duncan
 Nic Kotsoglo
 niceangel5
 Nicholas Robinson
 Nicholas Wylder
 nicholasduffy
 Nick Lorenz
 Nick Pendergrast
 Nick Wilson
 Nicki wallis
 Nicky Hayes
 Nico Bowen
 Nicola Badger
 Nicola Bessell-Browne
 Nicola Elton

Name/Organisation

mrodgers61
 mscorer
 mswsen
 mtabatznik
 mtangalaf
 mteplow
 mudji.nielsen
 mudskipper
 munroclare
 Murray Cassidy
 Murray Dodd
 Murray Pettersen
 Murray Rosenberg
 Murray Simon
 murrwill
 mwasiliev
 Nigel and Sandy
 Nigel Noake
 Nigel Rice
 nigelsandyp Perth
 Nikita Wyllie
 nikki
 Nikki Blowers
 Nikki Stringer
 nikki471
 nikkiboys
 nikkien
 Nili Duvdevani
 Nin Kirkham
 Nina
 Nina Ambrose
 Nina Kelly
 ninak
 Ninobirch1
 ninox44
 Niukin
 nixon.julie.j
 nmackay1982
 nmcgowran
 nmt1
 no1
 noelle.yeoman
 Noi Teng Hia
 Nola Stewart
 Nonie Atkinson
 Norma [Nina]Thompson
 Norma Hay
 Norma Lee
 Norman Noeppel
 Norman Pater
 npage
 nrakela
 nynka
 Nyokfong Woo
 o_pen2002
 Oakah
 oconnell.carmel.t

Name/Organisation

Natasha Kalvas
 natgibbs
 Nathan Fisscher
 Nathan Lawlerq
 Nathan Nisbet
 Nathan Nisbet
 Nathan Ryu
 Nathaniel Vale
 nativelandscapes
 Nayeem Aslam
 Neale Blackwood
 Neale Geoffrey Smith
 neensy13
 negraden
 Neil Chang
 ossie-s
 Oyster1997
 Ozcalling
 ozpom2007
 P Temperton
 P Turpin
 P_Ferber
 pablovoitzuk
 paddyc
 pafar1
 paigeturner45066
 Falcon Holdings
 paleeta
 palenqueb
 paleodeadfish
 Pam DiLorenzo
 pam gleisinger
 Pam Hall
 Pam Knox
 Pam Meredith
 Pam Nairn
 pam.formby
 pamela
 Pamela Barrett
 Pamela Crowe
 Pamela Free
 Pamela M Bennett
 Pamela Maynard
 Pamela Sunderland
 Pamela Sunderland
 Pamela VourosCallahan
 pamelajm
 pammyj10
 pamyll1
 Panda Broad
 panda_eyes13
 Pandora Garwood
 parkinsonjude
 parodux
 parsons.helen
 Pascale Delaisse
 Paschein1

Name/Organisation

Nicola Schniering
 Nicola Sibley/York
 nicola.karp
 Nicola-Jane le Breton
 Nicole Hunter
 Nicole Arielli
 Nicole Badham
 Nicole C Ward
 Nicole Ward
 Nicole Weber
 nicole4770
 nicolekbadham
 Nicolette Smuith
 nicspanbroek
 nienna
 Patrice Kettlewell
 Patricia Cera
 Patricia Haak
 Patricia Kershaw
 Patricia Leahy-Shrewsbury
 Patricia Lilly
 Patricia Olsson
 Patricia Putland
 Patricia Putland
 Patricia Sundstrom
 Patricia Zimmermann
 Patrick
 Patrick Apiata
 Patrick Couser
 Patrick Mccallum
 Patrick Ryan
 Patrick Venaille
 patrickhamill68
 Patsy Lisle
 patsyloh
 patti
 paul
 paul
 paul
 Paul Aramini
 Paul B
 Paul Bartlett
 Paul Black
 Paul Da Fonjeca
 Paul Daniel
 Paul Desboux
 Paul Farnhill
 Paul Gargano
 Paul Garratt
 Paul Harris
 Paul Hayes
 Paul Hayes
 Paul Kitchener
 Paul Liddell
 Paul Lowe
 Paul Melville
 Paul Nash

Name/Organisation

oconnor.frellis
 Ola Sunis
 oldfartwarren
 Olga Cernega
 Olimpia Cecora
 Oliver Noppel
 oliviela
 olivier.frob
 omec1
 omsagara
 oneillc
 onetreehill
 oni357
 oreilly_danielle
 Pauline Rea
 Pauline Thorne
 Pauline Vigus
 paulinemcgrath
 paulinemwhite
 paulmaggie
 paulwinthrop
 paulyboywatson
 pcarden
 pcole
 peedee
 Peel Preservation Group
 Peel-Harvey Catchment Council
 Peg Node
 peggy.nelson
 Pemberton Discovery Tours
 penelope

 Penelope Carrier
 Penelope.Robinson
 Penny Bennett
 pennyhanton
 pennyv
 Pepe Crespo
 Pernille Stent
 Perrey Ariane
 perrys2
 peruc_snir2005
 pests
 Peta Crogan
 Peta Monley
 Peta Rakela
 Peta Richards
 Pete Blake
 pete0762
 petepam
 peter
 peter
 Peter Bangle
 Peter Bath
 Peter Beatty
 peter betuel
 Peter Bresser

Name/Organisation

Pat Connor
 Pat Martin
 Pat Peake
 pat.armstrong
 pat.i
 patandjoe
 patbruce
 patfitz
 patkl
 patlea
 patlent
 patlowe
 patmcdonald
 Peter Jackson
 Peter Jensen
 Peter Lane
 Peter Lane
 Peter Marsh
 Peter Morris
 Peter Mutsaers
 Peter Nicholson
 Peter Pietroboni
 Peter Rachow
 Peter St Clair-Baker
 Peter Stewart
 Peter Swanson
 Peter Uhd
 Peter Wadsworth
 Peter Webley-Hurrell
 Peter William Toy
 Peter Williamson
 Peter, Anna, Claire, Louise and
 Beth Huxtable
 peter.faulkner
 peter.g.morris
 peter.hardinge
 peterc
 peterwallis
 Petra Hofmair
 petra.maxted
 Petta Baker
 pfuit
 pgi
 pglasgow
 pheralicious
 phil
 Phil Bailey
 Phil Barry
 Phil Bayley
 Phil Bouchet
 Phil Lee
 Phil Noonan
 Phil Shedley
 philhh
 Philip Griffin
 Philip Livingston
 Philip Murray

Name/Organisation

Paul Owens
 Paul Shann
 Paul Smale
 Paul Vassallo
 Paul Young
 paul.heidi
 paul.kaplan
 paul.simpson44
 Paula Dugmore
 Paula Morgan
 paulette.oldfield
 Pauline Lee
 Pauline Miles
 Phoebe Cargill
 Phoebe Coyne
 Phoebe Humphreys
 Phoebe Phillips
 Phyliss Cusworth
 Pia Bonifant
 pianobase
 PiaPrincess_2005
 Pickard
 Pieter Holwerda
 Pieterke Nicholls
 Pippa Dempsey
 Pixie Stott
 pjag
 pjbmovingon
 pjdesigns
 pjf
 pjjsinclair

 pjkrhomes
 Pjones01
 Plantall Forestry Consultants
 pmlkerr
 polebridgemod
 Polly Prior
 popcomic
 Possum Centre Busselton Inc
 potaylor
 powellontour
 prabhuta
 preferredpm
 prem_dhyana
 presto33
 primarch
 Priscilla Jude
 Priya
 Professor Kingsley Faulkner AM
 prosecutebushnow
 proudfoot.g
 prsink
 prudencerobertson
 ps_536102317
 ps_647926319
 psha8436

Name/Organisation

Peter Brett
 Peter Burrell
 Peter Christen
 Peter Dagnia
 Peter Dreisiger
 Peter Emmott
 Peter Endt
 Peter Forbes
 Peter Garwood
 Peter Goodall
 Peter Harris
 Peter Huxtable
 Rachael Dease
 Rachael Fox
 Rachael Louttit
 rachael.kirk
 Racheal Smart
 rachel
 Rachel Boyd
 Rachel Conroy
 Rachel Freebury
 Rachel Freebury
 Rachel Goodsell
 Rachel Murray
 Rachel Webster
 Rachelle Robinson
 rachelriley219
 radjahshellduck
 rae.price002
 rae1951price
 rae52r
 raekolb
 Raewyn Plackson
 Raffaele Cammarano
 raffcamm
 rainbowcoaster
 rakkle12
 Ralph Darlington
 Ram Ayana
 Ramona Jongepier
 Randall Atkinson
 randgcoster
 raosull
 raoul.abrutat
 rasmus7
 rattigan
 Raul Arribas
 Ray Flanagan
 Ray Johnson
 Ray Weller

 Raymond and Tessa Flynn
 Raymond Doust
 Raymond Grenfell
 Raymond Karam
 Raymond Zahra
 rayonas

Name/Organisation

Philip Patterson
 Philip Simon
 Philip Waterman
 Philippa Brain
 Phill Raso
 Phillip G Light
 Phillip Higgins
 Phillip Hoff
 Phillip Place
 Phillip Relf
 Phillip Rowe
 Rebecca Rees
 Rebecca Sanciolo
 Rebecca Tanner
 Rebecca Vangelder
 Rebecca Ward
 rebecca_tippens
 rebeccachapple
 rebeccaludemann
 reception
 reception
 Reda Brown
 redheadb
 redphreak2000
 Ree Logan
 Reece O'Connell
 Regan Logan
 Regional Development Australia
 Reidun Carstens
 Remco Bruin
 rena_koufakis
 Renae Cato
 Rene Birzer
 Rene Halstead
 Renee Chudleigh
 renee.blandin
 reneemyles
 Reto Zollinger
 Reuben Emmerson
 Rex Brown
 Rhian Thomas
 Rhiannon Welten
 Rhoda Spencer
 Rhonda Glover
 Rhys Brown
 Rhys Channing
 Rhys Jones
 Richard
 Richard Glover
 Richard Glowacz
 Richard Harper, Richard Bell and
 Bernie Dell
 Richard Hotz
 Richard Janes
 Richard Janes
 Richard Lee
 Richard Mann

Name/Organisation

ptfowler
 pulcina5
 punisher_jeremy
 pzuvelaerin
 quest2
 R Barbut
 R Circosta
 R G Lancaster
 R L Campbell
 R Palmer
 r.pearce
 Ricky Malatesta
 Ricky Towler
 Rigel Coveny
 Rikki Brasnan
 Rikki.ambrosius
 Riley Bradley
 Rini Margawani
 Rita Spallotta
 Rita Thoma
 Ritchie Smith
 rjacoyle
 rjacques
 rlkaru
 rlotte
 rmorris
 rnjd66
 Rob Connolly
 rob.jo.c
 Robbert Wolters
 Robbie Monck
 robcatomore
 Robear Rault
 robert
 robert
 Robert Palmer
 Robert Ambrose
 Robert Barwell
 Robert Bruce Marold
 Robert Bygott
 Robert Catomore
 Robert Cummings
 Robert Day
 Robert Duncan
 Robert Edgar
 Robert Fiegert
 Robert Geoffrey Walton
 Robert Hesketh
 Robert Hitchcock
 Robert Jackson

 Robert Kennedy
 Robert Kingston
 Robert Lewis
 Robert Mazzilli
 Robert McMurray
 Robert Orlando

Name/Organisation

rb
 rbagshaw
 rbecu
 rbrinker
 rdtaylor
 Rebbecca Cutter
 Rebecca Cassells
 Rebecca Chapple
 Rebecca McCabe
 Rebecca O'Donnell
 Roberto Jones
 Roberto Siriban
 roberto_trams
 Robin Ellis
 Robin Jackson
 Robin Scott
 Robin Scott
 Robin Trouchet
 robshevan
 robsnest
 robvvet
 Robyn
 Robyn Flemming
 Robyn Poore
 Robyn Shaw
 robyn.cuming
 Robyn.Fogarty
 robynwebb2
 Rochelle Spencer
 Rock Hoyer
 rockrabbit
 Rocky Mastaglia
 Rod Doust
 Rod MacKinnon
 Rod Mackintosh
 Rod Reynolds
 Rod Tyler
 Roddy Chiu
 Roddy Darlington
 Rodger Greville
 Rodney King
 Rodney Moss
 Rodney Tenardi
 Roeli Joosten
 roelifringe
 Roger Atmore
 Roger Cunningham
 Roger D Martin
 Roger D Martin
 Roger Seares
 Roger Underwood
 rogergayle1
 Rohen Steingold
 Rohin Imberger
 Roland Ames
 rolandeutekom
 Rolf Rasnusson

Name/Organisation

Richard Smith
 Richard Titelius
 Richard Yin
 richard.elphick
 richard.guyevans
 Rick Lane
 Rick Mason
 Ricki Coughlan
 rickinewman
 Ronald Ratner
 ronellebrossard
 RonM430
 ron-marg
 ronshaw12
 Rory O'Sullivan
 Ros Herbert
 Rosa Alcalá
 rosaliavinicombe
 Rosalind Christian
 Rose Dowling
 rosemary
 Rosemary Bezu
 Rosemary Fraser
 Rosemary Hale
 rosensoh
 rosenthas
 Rosi Hutter
 Rosie Jackson
 rosiehunt
 Roslyn Wang
 ross
 Ross Beldoni
 Ross Boughton
 Ross D Young
 Ross Knowles
 rosywatson
 Rowan Holgate
 Rowan Logie
 Roxanne Perry
 Roy George
 roymoss
 Roz Hart
 rozza_mixy_yey
 rpereynolds
 rpotter
 rr-anderson
 rravine
 rsharris
 rshoeschler
 rsm89814
 rstewart
 rtd
 Rudi Vanderputten
 rugreble@iinet.net.au
 Russell H Catomore
 Russell May
 Russell Thomas

Name/Organisation

Robert Parker
 Robert Peake
 Robert Petroboni
 Robert Rodoreda
 Robert Stanley
 Robert Tognetti
 Robert Weir
 Roberto Figueroa
 roberto.hornbrook
 Ruth Watson
 ruth_wetter
 ruthcliff
 ruthless_coyote
 ruthmiller
 rvimana
 Ryan Burns
 Ryan Keillor
 Ryan locke
 Ryan Michael Locke
 Ryan O'Connell
 Ryan Tangney
 Ryan Wilson
 ryan.oostryck
 ryanoostyck
 Rylan Blair
 S Beghen
 S Bergin
 S Edwards
 S Fox
 S K Eyre
 S M Slack-Smith
 S Odartei
 S Pickup
 S Plunkett
 s.d.page
 S.kvalsvik
 s_jenkins
 Sabah Steinlin
 sabbia.tilli
 sabina_77
 Sacha Ilich
 Sacha Free
 sachatheflasher
 Sage Cooper
 Sagepack
 sahasjaspringer
 Sairs
 Sallie Coulson
 sallieforrest
 sally
 Sally
 Sally Giles
 Sally Black
 Sally Boling
 Sally Dowinton
 Sally Metcalf
 Sally Sturgess

Name/Organisation

romjulcat
romola
Romola Harney
Ron Masters
Ron Palsar
ron.brown
Ronald John Bingham
Ronald McKirdy
Sam Rutten
Samantha Davies
Samantha Graham
Samantha Hanson
Samantha McFall
Samir Nassir
Sammia Rebecca Jensen
Samuel Porter
Sandie Rawnsley
sandjharman
Sandra Baxter
Sandra Hobb
Sandra Mullins
Sandra O'Neill
Sandra Reed
Sandra Rose
Sandra Waring
sandra.reed
Sands.europa
Sandy Hay
Sandy Hipper
Sandy Marcelo
sandy.chambers
Sanna Forslund
Sara Bradshaw
Sara Hajbane
Sara Monaghan
Sara Westergren
sarah
Sarah
Sarah Baron
Sarah Bell
Sarah Cooney
Sarah Derby
Sarah Dickinson
Sarah Flynn
Sarah Gilfillan
Sarah Hafer
Sarah Lewis
Sarah McMullen
Sarah McQuilkin
Sarah Miller-Eves
Sarah Nix
Sarah O'Grady
Sarah Peel
Sarah Potten
Sarah Powell
Sarah Shervington
Sarah Ward

Name/Organisation

russellsheridan
Rusty Rouse
rustygeller
Ruth Battle
Ruth Foley
Ruth Meyer
Ruth Saggars
Sascha Hewitt
Sascha Unger
Sasha Young
Sasha.Poli
sasha_barbie
Saso Dicoski
satimafn
Satyam Brown
Satyan Brown
Saunders Sawmill
sb71
sbarnard
sbeutier
scanlonjules
scd
schmoebe
schreibdemstein
scoob8178
Scott Archibald
Scott Wilson
scott0547
scottyxxx
scutler
sdgenovese
seabreeze131
seajay61
Sean Corrigan
Sean Dowsett
Sean Edmett
Sean Freeman
Sean Laurent
Sean Maher
Sean McFarland
Sean Monahan
Sebastian Outh-Aut
selena_alexis_hughes
Selina Ellis
seminig@inet.net.au
Sena Hwang
sephton3
Serena Zen
Sergio Padilla
service2love
sfloth
sfoster01
sfrawley
Sha Davies
shae.bloomer
Shanadavies
Shane Adam

Name/Organisation

Sally Wylie
sally.quealy
sallyc_46
sallypyvis
sallyssh2002
Sam Glenister
Sam Marynowicz
Shane Francis
Shane Hair
Shane Hunter
Shane Kennedy
Shane Moore
Shane Ruocco
Shane Sinclair
shane_lucy
Shani Logan
Shannon
Shannon Leahy
Shannon Paterson
Shannon Ziegelaar
Shanthi Goletsani
Sharee Malatesta
Sharmini Vegh
Sharon Burgess
Sharon Dutton
Sharon Ellement
Sharon MacMillan
Sharon Mann
Sharon Morris
Sharon Roche
Sharon Roddick
sharon stanley
sharpe_joan
Shaun
Shaun Carpenter
Shaun Hoffmann
shaushar
Shawn King
Shayla Stefanetti
Shayne Macri
shearleafurnish
she-dingo
Sheila Cousins
Sheila Murray
Sheila Parker
Sheila Pendlebury
Sheila Twine
Shelby Aramini
shell3397
Shelley Davies
shellseekers79
Shely Ourana
Sheridan Young
Sheryl Carmody
Sheryl Szylejko
shinrinart
shinz77

Name/Organisation

Sarah Wexler
sarah.baker
sarahbstewart
Sarcha Thurston
Sari Bennett
sarmite
Shire of Toodyay
Shire of Waroona
Shirley Dingley
Shirley Glover
shirley.joiner
shirlgirlj
Shona Huggard
Shona Hunter
shop
shourana
Shyam Druvy
Sian Kallahar
siddalljane
Signe Westerberg
Sigrid Lublow
silkeandkai
simdun
Sime
simkal
Simon
Simon Barton
Simon Blake
Simon Cherriman
Simon Coppock
Simon Crouer
Simon Dooley
Simon Galea
Simon Gillett

Simon Hawkins

Simon Moore
Simon Petas
Simon Rosengarten
Simon Wood
Simone Coleman
Simone Collins
Simone Pesson
simone.arena
Simonels455
Singye Wangchuk
Siobhan Mewes
sitivenitalei
sjdooley
Sjguzman
skilledengineers
skram
skurray
Sky Croeser
skypete
slamont

Name/Organisation

Shane and Joanne Drew
Shane Blakers
Shane Davis
Shane Field
Shane Flynn
smartipanz000
smcarden
smcobb
smead_j
smilla13
smith.marshall
snookylumps48
SnowdogLisa
Solana Rosenthal
solaris
solfan
somers.family
Sonia Emery
Sonia Hycza
Sonia Spiers
soniaemery
sontology
sooz68
Sophia Gargano-Arnold
Sophia Sharpe
sophia.hornsby
sophie
Sophie C
Sophie Hick
Sophie Johnson
Sophie McGrath
Sophie Nixon
Sophie Teede
Sophie Wheeler
South West Forests Defence
Foundation
South West Native Title Working
Parties
spirits-dreaming
spwnoakes
spwyb
srkansas
rosenkr
srs7837
Ssue Griffiths
Stacey Hamilton
Stacey Magan
Stacey Malatesta
stackerz
Stacy Hosking
State Heritage Office
steelhomes
Stefan Boscheinen
Stefan White
Steffen
Steph_denise06
Stephanie Myles

Name/Organisation

Shire of Bridgetown-Greenbushes
Shire of Manjimup
Shire of Murray
Shire of Nannup
Shire of Serpentine Jarrahdale
Stephen Genovese
Stephen Genovese
Stephen Newbey
Stephen Paterson Jones
Stephen Phillips
Stephen Smith
Stephen Thomas Flounders
stephen.lloyd
stephen.patterson
stephendelaney
steve
Steve Beaumont
Steve Bush
Steve Creek
Steve Fisher
Steve Flynn
Steve Gartner
Steve Gethan-Davies
Steve Hart
Steve Hearl
Steve MacMillan
Steve Morel
Steve Pearce
Steve Pearce
Steve Sertis
Steve Sierociak
Steve Stewart Kelly
Steve Wilson
Steve Yuen

steveh7

Steven Bovenizer
Steven Bush
Steven Bush
Steven Edwards
Steven Forrester
Steven Macdonald
Steven McKinney
Steven Whiteside
Stewart Ford
Stewart McAllister
Stewart Seesink
stewartparkinson
Stoffer Barral Krol
stolltho
stoneageconstruction
storiesmynanatells
Story Brandon
strzina
stu
Stu MacLeod

Name/Organisation

sleegers
 sls
 slyasa
 smaher
 stuartweiss3
 stubby_610
 stucker
 subirtw
 Sudeva Hawkes
 sue
 sue
 sue
 Sue Briede
 Sue Butcher
 Sue Ellerman
 Sue Ganz
 Sue Hayward
 Sue Lesmond
 Sue Meacock
 Sue Oldham
 Sue Pastore
 Sue Pritchard
 Sue Strutt
 Sue Taylor
 Sue Youngman
 sue.neil
 sue.nightingale
 sueandgeoffclarke
 sueganz
 suehw13
 sugars2
 Sunny Strobel
 sunpreston
 sunshiine
 suomigirl666
 surfgirlbritt
 surfnaj
 Susan Knight
 Susan Bell
 Susan Bellamy
 Susan Brown
 Susan Clarke
 Susan Fowler
 Susan Pelakh
 Susan purdy
 Susan Rice
 Susan Shobbrook
 Susan Sowerby
 Susan Sowerby
 Susan Taylor
 Susan Usher
 Susan Walton

 Susan Wellington
 susan_wilde
 Susana C Schmidt

Name/Organisation

Stephanie Wenzl
 Stephen Allan
 Stephen Bornatici
 Susann
 Susanne Cederlund
 Susanne Taylor-Rees
 Sushma Yadev
 susie
 susiecrick8
 susienyc
 susnles
 Suss Monahan
 suzanna_wallace
 suzanne
 Suzanne Currey
 Suzanne Neamtan
 suzanne_richardson
 Suze Collett
 Suzie Kettle
 Svaaba
 Sven Borg
 svenmasseur
 sverwuster
 Swabodhi Francis
 swalters58
 sweetlife
 swwhite
 swomeeswans7
 Sylvia Soltyk
 sylviajkershaw
 sylviarau
 sylviasoltyk
 Sylvie Walker
 Symone Softley
 T Bayer
 T Sticca
 T Williams
 tabdolphins
 tabicat66
 Tahlia
 Tahniah Trusler
 tahoeleigh
 talbot
 Taleisha
 Talia Eugene
 Talila Stan
 Tamara Cohen
 Tamaracohen
 Tammi Le Breton
 Tammie Reid
 Tammy Best
 Tammy Dowse

 tamrose82
 Tamsyn Whitcher
 Tani Philpott

Name/Organisation

stu11288
 Stuart and Amanda Payne
 Stuart Bailey
 Tania Barr
 Tania Dionisio
 Tania Harrison
 Tania McVeigh
 Tania Stidwell
 Tania69
 Tanya Awad
 Tanya Garvin
 Tanya K Smith
 Tanya Marwood
 Tanya Vincent
 tanya.m
 Tara Devoy
 Tara Ormsby
 Tarn Donaldson
 tarna
 Taryn Walton
 Tatiana Torres
 Tchan
 tdlarke
 Tegan Mossop
 tembawood
 Teneille Simcock
 teneille_williams
 Tere Garnons-Williams
 terence.goodman
 Teresa Harshaw
 Teresa Wilson
 teresacheesman
 teresavimini
 tereshaa
 Terina Eastman
 Terje Solheim
 terrapin_b2000
 Terri Lister
 Terri Strong
 Terrie Wayside
 Terry Huey
 Terry Flanagan
 Terry Mublinis
 Terry O'Hara
 Terry Wainwright
 terryberryballs
 Tess Stapleton-Clark
 tess.29
 Tessa Coupar
 tessagirrl
 tgargett
 The Bushfire Front Inc
 The Chamber of Minerals and Energy
 of Western Australia
 The Institute of Foresters of Australia
 The Rustic Bushwood Group

Name/Organisation

susanmckenzie
 The Wilderness Society
 the.schmernies
 theblands
 thecains123
 thejo
 Thelma McKirdy
 themsey
 theonlyrizzy
 Theresa Manning
 Theresa Putland
 theresasutt
 Therese Quinlan
 thierryv
 Thomas Andreasen Hoyer
 Thomas Chvojka
 Thomas Greig
 Thomas McKeesick
 Thomas Michael Bucholz
 Thomas Smith
 thomas.maxwell
 thomasbruec
 thomasgabriela
 thompson14ster
 Tiana Arya
 Tiaan Khan
 Tim Barling
 Tim Doherty
 Tim Dymond
 Tim Gallagher
 Tim Grime
 Tim Johnson
 Tim Pitts
 tim.frodsham
 tim.tucak
 Timber Communities Australia Ltd
 timcityfarm
 Timothy Burr
 Timothy Hosey
 tina
 Tina Behn
 Tina Dubois
 Tina Duncan
 Tina Gough
 tingrith63
 tju
 tlbateman
 tmmacc15
 tmperth
 Tobias Newman
 Tobias Snazell
 Toby Ann Reese
 Toby Fletcher
 Toby Liddle
 Toby Rees
 Toby Travers

Name/Organisation

Tania
 Toby Whittington
 Tom Bellamy
 Tom Bonham
 Tom Fredrick Collins
 Tom Hawkins
 Tom Hoyer
 Tom Livermore
 Tom Maley
 Tom Pitman
 Tom Shaw
 Tom Smith
 tom.hana
 Tomas Pradas
 Tommy Torredal
 Toni Webster
 tony
 Tony Cheesman
 Tony Clunies-Ross
 Tony Danzi
 Tony Davidovski
 Tony Evers
 Tony Gintz
 Tony Lewis
 Tony Lyons
 Tony Pedro
 Tony Rawnsley
 Tony Ryan
 Tony Troughton-Smith
 tony.powell1
 tony.ransom
 tony.rouphael
 tonyhaddress-wikil
 tonyjowns
 tonylanewa
 toobide4
 toobie0535
 Tourism WA
 Toyworld Manjimup
 TP&M Energy Pty Ltd
 trace.upthecreek
 Tracey Bettridge
 Tracey de Grussa
 Tracey Mullan
 Tracey Wilson
 tracey_zac
 tracy
 Tracy Eliades
 Tracy Kent
 Tracy Ladhams
 Tracy Leigh
 Tracy Skippings
 Tracy Webster
 Tracy Wilson
 tracy.stone
 tracyjoy

Name/Organisation

The Warren Blackwood Alliance of
 Councils (Inc)
 train462
 traudel
 Traudel Weber
 Travis Arthur
 Travis Kroonenburg
 Travis Tanner
 Treana Jones
 Trent Rachow
 Trevor Clark
 Trevor Coulter
 Trevor Harrison
 Trevor King
 Trevor Parke
 Trevor Pedderson
 Trevor Vowles
 Trevor Whitton
 Tricia O'Reilly
 Trina Glover
 Trina Prince
 trish
 Trish Brown
 Trisha Kotai-Ewers
 trisheb1
 trishgavan
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 Troy Rasmussen
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 Tuija Kielevainer
 Tunya Versluis
 turtlezavirgo
 Tweeti1952
 twitham
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 Tyson Cherrie
 Tzuyin Lin
 Umberto Margio
 undies2002-undies2002
 unicorn7
 Uphil Govinage
 Ursi israng
 us2here
 Ushan Boyd
 v48loes
 VA Major
 Vadim Melerzanov
 vahri
 Val Stone
 Val Vallie
 Valerie
 Valerie Heath

Name/Organisation

Valerie Krantz
 Valerie Vallee
 Valerie Vangel
 Valeska Wood
 Valma Bowaterer
 valthomo
 Vanessa Jones
 Vanessa Roberts
 Vanessa Shugg

 Vanessa Wheeler

 Vanessa Yeomans
 Vanessa.jones
 Vasco Bilelo
 vaughngrey
 Vera Hughes
 Vera Ross
 Veronica Futo
 Veronica Ingrilli
 veronica.hempel
 veronique
 veronique.larg
 Veselka Hastings
 Vicki A. Gouteff
 Vicki Harriss
 Vicki Harriss
 Vicki Leishman
 Vicki Lennon
 Vicki Ward
 Vickibix
 Vickie Tomasi
 Vicky Kerfoot
 Vicky McOnie
 Vicky Poelman
 Victor Berna
 Victoria Martin
 Victoria Pitchford
 Victoria Rutherford
 Viharo Wood
 villageeliot
 Vince Corlett
 vince_desimone
 Vincent Buegge
 vincent.aj
 vinmas2
 Virginia Brown
 vivaerbeti
 vivian
 Vivienne Glance
 Vivienne Langham
 Vivienne O'Shea
 vivienne.r
 vogt
 VS Miller
 yibishop
 ymcunningham

Name/Organisation

vslater
 W D Castleden
 W Moncrieff
 W Randell Clarke
 W Schokhoff
 w.d.parkinson
 w.penhale
 wa
 Wade Hammond

 wadifarm

 Wael Allam
 WALGA
 walgray@bigpond.com
 wallerp
 walsh.marye
 Walt Kleine
 Walter Marlow
 wambyn
 Wanda Keightley
 Wang Yaodong
 Warren Barrington
 Warren Haley
 Warren House
 warren.haley
 Warrick Alldridge
 warwick
 wastbury49
 Water Corporation
 waterlily
 Waughs Forest Services
 wavelover64
 waves1
 Wayne Brooks
 Wayne Connelly
 Wayne Hall
 Wayne King
 Wayne Monks
 Wayne Pontague
 Wayne Wilks
 wayoveryonder
 welborn
 wellsfam
 Wendy Boggs
 Wendy Claxon
 Wendy Dugmore
 Wendy Eiby
 Wendy Elphinstone
 Wendy Hawkes
 Wendy Hodgkinson
 Wendy L Smith
 Wendy Lewis
 Wendy Osborn
 Wendy Robinson
 zacedwards
 Zachary Redmond

Name/Organisation

Wendy S
 Wendy Slee
 Wendy Watson
 wendy.sanderson
 wendy.till
 wendylingham
 Werner Bergman
 wernerbrunner
 Wes Marlow
 Western Australia Furniture
 Manufacturers Assoc Inc
 Western Australian Farmers
 Federation
 Western Australian Forest Alliance
 wgreen5
 Whata Beets
 wheelyburger
 wheywood
 Whicher Range Energy
 Whiteland Milling
 whitestripessuzy
 wickedbeatles
 widesky
 widswilson
 Will White
 Willeke de bruijn
 William Todd
 William and Susanne Brown
 William Barbour
 William Busch
 William Lewis
 William Marshall
 william4
 Wilma Brokaar
 Wilma Denholm
 wilvery
 winholtz
 winnie_smth
 Wjklock
 wjvinns
 wlajb5
 wolffduo
 wollemisue
 woodman
 woollymammoth
 wsb70
 wsj
 Wunjo Stardust
 Wyrddpath
 x500
 Xanthi Christidis
 xplora77
 xsecretsx
 Y U
 yecats82
 zipzap
 zoe

Name/Organisation

Yolanda Brookes
Yuliya Yakovleva
yvette.heath
yvonne
Yvonne Ducat
Yvonne Ingeme
Yvonne Soares

Name/Organisation

zakrev
zamia7
Zeb Parkes
Zelma Duncan
Zennie McLoughlin
zeroyakiller267
zilko93

Name/Organisation

zoe
Zoe Sharp
Zohl de Ishtar
Zsuzsanna Herenyi
Zuzanna Kania

Glossary of Acronyms and Abbreviations

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