



**Comments on Environmental Protection Authority (EPA) report and recommendations on proposed Forest Management Plan 2024–2033. Report 1745 August 2023**

South-West Forests Defence Foundation Inc. <https://southwestforestsdefence.org/>. September 2023

As required by the *Conservation and Land Management Act*, the proposed Forest Management Plan 2024–2033 (FMP) was prepared by the Department of Biodiversity, Conservation and Attractions (DBCA) in consultation with the Forest Products Commission (FPC).

The EPA's report to the Minister for Environment is now open for a three-week public appeal period, closing 25 September 2023. Appeals should be directed to the [Office of the Appeals Convenor](#)

We support:

- Independent scientific review of prescribed burning. It must be independent with terms of reference that cover all relevant issues and have full public participation.
- Prescribed burning locations, activities, and performance compared with aims or objectives to be reported, independently reviewed, and published.
- Implementation of national park proposals from previous FMPs, dating back to 1988!
- Addition of 400,000 ha of forest to the conservation estate.
- More forest reserved in the northern jarrah forest.
- Independent assessments of DBCA's activities.
- CPC to get more resources to ensure there is an independent audit function and improve its capability to have greater oversight for independent audits, reviews, and periodic assessments – not just 'considered' but allocated.
- The Minister to enhance resourcing for implementation of the FMP to improve communications and public reporting – not just 'considered' but allocated.
- Collaboration with other research institutions, non-government organisations, traditional owners, and natural resource management groups.
- More attention to GHG emissions with improved understanding of emissions from prescribed burns to be incorporated into future GHG accounting and reporting.

We oppose:

- So-called 'ecological thinning', up to 8,000 ha a year (more than the average 6,500 ha logged each year under the current FMP), because it would do more harm than good as DBCA and the EPA well know.
- Any suggestion that 'ecological thinning' be conducted in informal reserves, renamed 'Disturbance Avoidance Zones'. Not just 'largely excluded' but prohibited altogether.
- 'Ecological thinning' in proposed and even existing national parks.
- Commercial thinning. With the FPC responsible for contract management, planning and operational support for 'ecological thinning' for forest health, commercial considerations are likely to override ecological requirements.
- EPA's endorsement of DBCA's 200,000 ha annual prescribed burn target.

We propose:

- The end to native forest logging as promised by former Premier McGowan, not an end to 'large-scale commercial timber harvesting' as reinterpreted by DBCA.
- An evaluation of whether 'ecological thinning' is able to achieve environmental outcomes and objectives carried out in long-term trials conducted before thinning activities are begun anywhere.
- Implementation of previous national park proposals to be mostly finalised by mid-term review and completely finalised by end-of-term review.
- Addition of 400,000 ha of forest to the conservation estate to be mostly finalised by mid-term review and completely finalised by end-of-term review.
- No annual 200,000 ha prescribed burn target. Burning should be excluded from long unburnt forest and limited to 500 metres of assets in need of protection (with burning as a last resort) while we wait for the independent scientific review to take place and make its recommendations.
- [Case against thinning karri forest](#)
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