

Submitted on Monday, September 17, 2018 - 09:20

DETAILS

Company: [REDACTED]
First name: John
Last name: Clarke
Address: [REDACTED]
Suburb: [REDACTED]
State: [REDACTED]
Postcode: [REDACTED]
Phone: [REDACTED]
Email: [REDACTED]
Sector: Other Forestry

NATIVE VEGETATION CLEARING

1 . Would a strategic approach to clearing, through a strategic purpose permit, benefit you?

Response: unsure

Comments:

My comments apply to private landowners in the southwest of WA who wish to manage their native forest sustainably, for timber and other values. These landowners do not want to "clear" their stands of native forest at all, therefore the term "clearing" is inappropriate and misleading.

I suggest that these landowners do not need any sort of permit at all. However, given that the definition of "clearing" in the Act includes the removal of any vegetation, and given that changing this definition may not be practicable in the short term, I suggest a new form of permit be created to cater for any sort of treatment of native forest for the purposes of "sustainable forest management".

It should be noted that the area of privately owned native forest in the southwest is in the vicinity of 300,000 hectares.

2. Is the 'purpose component' reasonable to apply considering the added complexity of assessing this type of clearing permit?

Response: unsure

Comments:

Again, my comments apply to a landowner wishing to sustainably manage his stands of native forest.

The "purpose" is quite straight forward and can and should mirror the practices carried out by the Forest Products Commission (overseen by the Department of Biodiversity, Conservation and Attractions (DBCA))....that is, to manage the forest for all its values in perpetuity.

The key to any management activity is a management plan which should be prepared for the landowner by a qualified forester with suitable experience. The plan can be checked/approved by DWER with assistance as necessary from DBCA.

Given that the areas involved are not likely to be large (say less than 100 hectares in most cases), the management plan need not be overly complicated or detailed.

3. Is the proposed fee structure fair and does it adequately reflect differences in the financial capacity of clearing permit applicants?

Response: no

Comments:

The suggested \$2000 fee for a landowner wishing to sustainably manage his stands of native forest is unfair and unnecessary and likely to exceed the value of any revenue he may recover from sale of forest products in the short term.

4. What is the likely impact on your business or industry of the proposed clearing fee structure?

Comments:

The proposed 1000% increase in fee will be a further disincentive to proper forest management for landowners.

5. Additional comments regarding Native Vegetation Clearing not addressed in the questions above.

Comments:

Again, I stress that my comments apply to private landowners wishing to manage their native forests for

all values including timber, water and biodiversity.

Most stands of privately owned native forest in the southwest have not been managed optimally over

the past 150 years. In many cases they have been subjected to

exploitative harvesting for sawlogs, with

little attention given to follow-up silvicultural treatments. This has often resulted in degraded stands of

trees or overstocked stands of regrowth trees, often carrying heavy fuel loads and consequent

dangerous fire hazards.

DWER need to work to ensure that landowners wishing to improve their native forests by appropriate

silvicultural treatments are not discouraged by an onerous permit system.

Instead, with a drying climate

in the southwest, it is becoming more important that these landowners are encouraged to manage their

forests properly to ensure their future health and resilience.

WATER

6. Do you consider it reasonable for taxpayers to pay 100 per cent of the cost of assessing water licence and permit applications and if so, why?

Response: no

Comments:

7. If water licence and permit assessment fees were introduced, what do you consider to be an appropriate fee for a water licence or permit application?

Comments:

Cannot comment

8. Would you consider a risk-based model for determining water licence and permit application fees to be appropriate? If not, what basis could the department use to structure fees?

Response: yes

Comments:

9. What would be the likely impact on your business or industry if water licence and permit fees were introduced?

Comments:

Not applicable

10. If water licence and permit assessment fees were introduced, how could the collection of fees be timed to better support your business or industry? For example, would you benefit from paying fees up front, at the end of a licence assessment or annualised over the term of the licence?

Response: unsure

Comments

11 . Additional comments regarding Water licences and permits not addressed in the questions above.

Comments:

Nil