



INSTITUTE OF FORESTERS OF AUSTRALIA

Cost Recovery Responses
Department of Water and Environmental Regulation

[REDACTED]

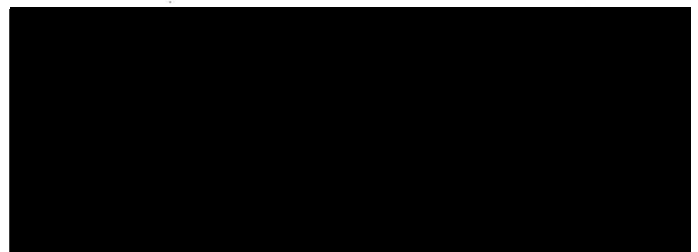
Via email: fees@dwer.wa.gov.au

PROPOSED NEW APPROACH TO COST RECOVERY FOR ISSUE OF NATIVE VEGETATION CLEARING PERMITS AND WATER LICENCES - SUBMISSION FROM INSTITUTE OF FORESTERS OF AUSTRALIA (WA DIVISION)

The Institute of Foresters (IFA) is a national organisation that represents the views of forest management professionals and has some 100 members in Western Australia who work in native forests, plantations and environmental services. The IFA is particularly interested in encouraging private landowners in the south-west of Western Australia to better manage their native forests. The DEWR's public consultation process regarding a proposed new approach to setting of fees for clearing permits and water licences provides the WA Division of the IFA an opportunity to offer the following comments and suggestions with respect to Native Vegetation Clearing, using the headings suggested by DEWR:

1. *Would a strategic approach to clearing through a strategic purpose permit be of benefit?*

The proposed strategic approach to clearing permits - with fees set in proportion to the area cleared - make sense, given that the costs of assessment by DEWR would generally rise as the area to be cleared increases. However, the IFA wishes to make the point that for landowners with a desire to sustainably manage their stands of native forest, by applying silvicultural treatments, a completely new approach is required. The term "clearing", as defined in the Environmental Protection Act, is inappropriate and misleading for landowners who have no desire to clear their forests. In this circumstance the IFA suggests that either no permit at all is required (requiring an amendment to the definition of "clearing" in the Act) or that a new form of permit be created for any sort of treatment of native forest for the purposes of "sustainable forest management".





2. *Is the purpose component reasonable to apply considering the added complexity of assessment?*

The purpose component is reasonable, but again the distinction needs to be made between permanent and/or total clearing of an area of native vegetation versus the silvicultural treatment of an area of native forest for improved management of that area of forest for all its values, including timber, water and biodiversity. The key to any management activity is a management plan which should ideally be prepared for the landowner by a qualified forester with suitable experience. The plan can be checked/approved by DEWR with assistance as necessary from appropriate staff from the Department of Biodiversity, Conservation and Attractions. It is important however that the checking/approval process be efficient and prompt. Given that the areas of privately-owned native forest subject to silvicultural treatment are not likely to be large (say less than 100 hectares in most cases) a management plan need not be overly complicated or detailed.

3. *Is the proposed new fee structure fair?*

The IFA contends that the proposed \$2000 fee for a landowner wishing to improve the health and vitality of his native forest and to manage it sustainably, is unfair and unnecessary. This sum is likely to exceed the value of any revenue he may recover from sale of forest products resulting from silvicultural treatments applied.

4. *What is the likely impact on business?*

Landowners need to be encouraged to manage their stands of native forest. Although the steps required to obtain a permit can be onerous, the current fee of \$200 tends not to be an impediment. Increasing the fee by a factor of 10 to \$2000 will be a serious impediment.

5. *Additional comments.*

Many if not most stands of privately-owned native forest in the south-west have not been managed optimally for the past 150 years. In many cases they have been subjected to exploitive 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.

In 2005, the highly respected forester and fellow of the IFA, Mr Jack Bradshaw, wrote a booklet entitled "*Managing private native forests and woodlands in the south west of Western Australia – combining wood production and conservation*", noting that over 300,000 hectares of privately-owned native forest occur within the main forest belt of the southwest. The



booklet includes a flow chart which highlights the detailed and onerous process necessary for obtaining approval to harvest any vegetation.

The IFA encourages DEWR to work to ensure that landowners wishing to improve their native forests, by application of appropriate silvicultural treatments, are not discouraged by an onerous permit system. Instead, with a drying climate in the south-west, it is becoming more important that these landowners are encouraged to manage their forests properly to ensure their future health and resilience.

Members of the WA Division of the IFA are willing to meet with DEWR staff to discuss the above points at any mutually suitable time. Members would also be willing to assist in design of a new permit system for private native forest landowners who wish to silviculturally treat and hence improve the status of their forests.

[REDACTED]
John Clarke
Environmental Spokesman
WA Division of the IFA

14 November 2018
[REDACTED]