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Cost Recovery Responses  
Dept of Water and Environmental Regulation  
Locked Bag 33  
Cloisters Square  
PERTH WA 6850

Dear Madam,

**Submission on costs of licences for "clearing"**

In reviewing the proposed increases for licenses for "clearing" I have discovered the anomalous situation that DWER requires a land owner to purchase a clearing license for silvicultural operations, for example thinning of regrowth native forest or of a plantation of native tree species.

This is palpable nonsense.

Thinning is *not* clearing. Thinning is reducing the number of trees in a stand of trees so as to focus the growth potential of the site onto fewer, larger trees. The forest is not "cleared", but remains a forest, in fact it is a more productive and healthy forest.

Charging a fee for this is absurd. On the contrary you should be encouraging land owners to improve the health and productivity of their native forests. There is only one thing you should do, if anything at all, and that is to require a landowner to observe correct silvicultural principles. These have been set out in documents produced by government foresters many years ago.

I am well aware that some environmental activists object to thinning of State forests on the grounds that to cut down any tree is wanton evil, similar to agricultural clearing, the first step in turning a lovely forest into a paddock of cape weed. However, professional environmental managers, especially those paid by the government, should be capable of distinguishing between agricultural clearing and a genuine silvicultural operation whose aim is to increase the value and growth of the forest, far from eliminating it.

Thinning has an additional benefit: in the early post-thinning days it enhances infiltration of rainfall to groundwater and flow into streams. This is an outcome for which DEWR should be aiming, not preventing.

So, my recommendations are:

1. Abandon any idea whatsoever of charging landowners an increased fee for a license to undertake sensible silvicultural operations on private forests; and
2. Re-write the regulations to take silvicultural operations out of the definition of clearing.

Yours sincerely



Tree Farmer  
October 31, 2018