



THE INSTITUTE OF FORESTERS OF AUSTRALIA &  
AUSTRALIAN FOREST GROWERS

**Feedback on Karri Forest Management Plan**  
**3 May 2021**

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The Institute of Foresters of Australia & Australian Forest Growers (IFA/AFG) is pleased to make this submission and provide Feedback on the on Karri Forest Management Plan.

## **1. About the IFA/AFG**

The IFA/AFG is the professional body representing over 1000 members who are forest scientists, professionals and managers operating in all aspects of forest and natural resource management, including forest conservation, throughout Australia.

Forestry professionals, informed by the science of natural resource management, play a crucial role in shaping the future of forests, including plantation forests and farm forestry projects. We advocate balanced land use that meets society's needs for sustainable forest management, timber supply, and conservation outcomes.

The Institute of Foresters of Australia (IFA) and Australian Forest Growers (AFG) merged in early 2019. This new merged identity represents all segments of the forestry profession, including public and private practitioners and growers. Members are engaged in many aspects of forestry, nature conservation, resource and land management, research, administration and education.

### **1.1. Scope**

The importance of scale, and the existence of substantial CAR reserve systems is well addressed. Harvesting of forest products is confined to a minority area of the total FMU (44%). The Warren bio-region is one of the best represented of all the Australian recognised bioregions, with thirty percent permanently reserved.

The FPC and DBCA are to be commended for the creation of informal reserves within the FMU. That the FPC is identifying and voluntarily setting aside areas of Type 2 Old-Growth forests is evidence of genuine efforts to preserve biological diversity and respect community expectations.

### **1.2. Biological Diversity**

The KFMP correctly assesses impacts at the "landscape" scale, considering how disturbance activities are present within a mosaic of reserves, private property, and reasonably intact landscape level forests.



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The silviculture in place is well developed. It contains mitigation measures such as retained legacy elements, and consideration of specific faunal needs such as veteran marri for black cockatoos.

The creation of secondary habitat trees for retention is a good example of adaptive management.

### **1.3. Ecosystem Health and Vitality**

#### **FIRE**

The KFMP states that "To prevent fires for extended periods of time of attempt to do so may be detrimental to biodiversity conservation and the protection of the community". The scientific evidence, practical experience in WA, SE Australia and western North America would all suggest that "may" should be replaced with "will".

Fire mitigation is indeed vital for maintaining productive capacity. The significant areas of vulnerable regrowth Karri burned in the O'Sullivan fire of 2015 (approximately 6,500 ha) were of concern to the IFA, due to the future impact upon sustainable yields. It is concerning that after 6 years, only 620 ha of the State Forest area has been salvaged and regenerated.

Approximately 24,000ha of 30-45 year-old Karri exists within the FMU (in State Forests available for timber harvesting). The forest industry is relying very heavily on this resource successfully maturing and providing the basis for future economic activity in the South West. It is understood that the protection of this forest is challenging due to terrain and other seasonal complexities.

The IFA promotes the use of prescribed burning to mitigate against damaging bushfires, and is supportive of the State's continued use of prescribed fire. However, the IFA has a view that the amount of State Government resources (personnel and expenditure) dedicated to bush fire mitigation in the State Forests and National Parks of the SW in general, has not been maintained at historical levels, and has declined in real funding terms. The IFA would like to enquire about the annual area subjected to prescribed burning in this FMU in the last several years, compared to the 1980's and 1990's.

The IFA believes that the availability of fire response resources (personnel and equipment) pre-positioned in work centres throughout the South-West has declined, relative to the 1990's. The IFA is not convinced that sufficient resources are being devoted by the State to protecting WA's forests and forest products. We would appreciate a comparison of the personnel and equipment available today, against that available twenty-five years ago. It is our understanding that the Karri Forest FMU has managed to maintain relatively high levels of personnel and equipment, compared to other forested areas.

The IFA also has a concern that the experience levels required for managing the complex protection burns previously mentioned are being maintained. A reliance on seasonal staff by



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Parks and Wildlife is a major contributing factor. We are also aware that funding restrictions and reduced workloads in “off season” works for other agencies such as the FPC are factors.

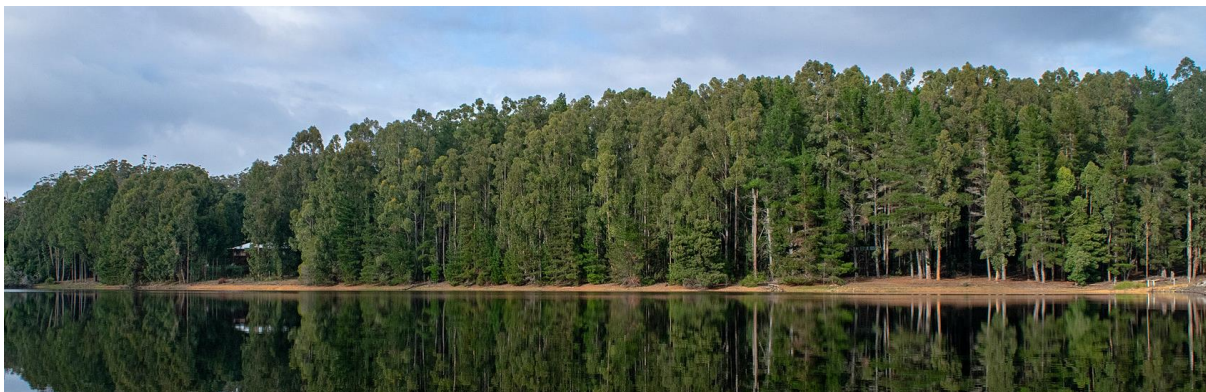
We would encourage the FPC and the Parks and Wildlife Service to work cooperatively to re-integrate works programs to create cadres of experienced fire fighters – public or private. We believe that the greater economic good of the State and protection of economic assets will outweigh any apparent inefficiency in moving away from the present atomised privately contracted service providers undertaking disparate various management activities.

### **OTHER THREATS**

It is not apparent that the resources provided to manage other threats to the State Forest and National Parks are sufficient to manage these threats. The compliance and regulatory burden of Phytophthora mitigation falls upon the economic users of the forest. Controls upon access and enforcement of prohibitions for recreational and public users could benefit from better resourcing.

The IFA believes that more pro-active steps could be taken to mitigate the risks around the spread of plantation wildings into native areas. There is scope to combine mechanical fuel reduction treatments around plantation assets that will concurrently eliminate mature seed sources. Regular follow up with prescribed burning will prevent wilding species reaching sexual maturity and contributing to secondary invasions.

It is positive to see pro-active steps being taken in monitoring for myrtle rust incursions.



*Figure 1 - Pine wildings in Karri*

### **1.4. Soil and Water**

The controls that FPC has in place for managing soil and water impacts are commendable. The IFA applauds the renewed commitment to work with the Parks and Wildlife Service to develop catchment management plans for increasing surface water flows through silviculture. With the high level of interest in irrigated agricultural developments, this could support other state



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development goals and the IFA encourages FPC/DBCA to ensure that they make policy-makers aware of the amount of additional water that could be generated from silviculture.

### **1.5. Climate Change and Carbon Cycles**

Comment has been made in the observations section below about the opportunities that exist to displace fossil fuel usage.

### **1.6. Productive Capacity**

The yield regulation of the Karri FMU appears to be well managed, and conservatively applied. Looking for new markets is a prudent strategy of diversification.

#### **SILVICULTURE**

The IFA observes that the term “clearfelling” has come to take on a pejorative meaning. In other parts of the world, the term “final harvest” or “regeneration harvest” is increasingly common.

That the FPC has progressively added refinements to its silvicultural practices such as retaining legacy elements is strong evidence of adaptive and sensitive management. Noteworthy also is the inclusion of specific habitat elements for threatened species such as forest red Cockatoos.

#### **FOREST REGENERATION**

The FMP notes that regeneration requires a post-harvest burn, to create a fertile and receptive seed bed. Given that the Karri is regenerated with seedlings, there are some observations made further below regarding site preparation strategies that may be considered.

### **1.7. Socio-Economic Impacts**

The IFA commends the Karri FMP for its integrative approach to forest management. Public (and increasingly also private) forest management requires the balancing of a range of outputs and values desired by society.

Regarding visual amenity, the IFA would encourage the FPC to be less reticent in displaying its good silvicultural practices (particularly T1 and T2 Karri thinning) to the public. Buffer areas and visual amenity strips reinforce in the public's mind that forestry activities are something that needs to be hidden away.



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### 1.8. Stakeholder Engagement

The IFA sincerely appreciates the opportunity for genuine engagement provided by the process. We would request that the FPC please consider a request from the IFA for a follow up field tour to discuss the topics raised in this submission.

### 2. Questions arising from the KFMP

1. There is 790 hectares of unallocated or vacant crown land within the FMU. Is there any fire management or community protection benefit to be gained by including this area into harvesting and treatment plans?
2. Are the objectives for biodiversity accompanied by measurable indicators to determine progress? For instance, have any species within the FMU transitioned to a higher priority or more threatened status? (page 22 of 68).
3. Is the removal of 75mm+ material more than one metre away from crop and habitat trees completed during harvesting operations or during burn preparation operations?

### 3. Feedback on HCV Assessments

The FPC is to be commended for an exhaustive effort on cataloguing the High Conservation Values (HCVs) within the Karri Forest Management Unit.

The mitigation measures that the FPC has in place to manage potential impacts on HCVs are exhaustive and demonstrate consultation with informed scientists and conservation managers. The system, if anything is over-governed. There is external auditing of the FPC by FSC Auditors. The FPC conducts rigorous internal audits. Parks and Wildlife also monitor compliance to management plans. FPC monitors and regulates their contractor's compliance to management plans and operational documents.

- HCV 1 – The DAS system is robust and avails itself of the most up to date knowledge of threatened species.
- HCV 2 – see previous comments about priority of salvage and rehabilitation.
- HCV 4.3 - Barriers to destructive fire – see previous comments on prescribed burning, personnel and mechanical fuel reduction.
- HCV 4.4 - See previous comments on silviculture for water production.
- HCV 5.3 Food and Medicines fundamental for local traditional indigenous uses – The FPC has taken a sensible approach that recognises the large area of Karri forest that is already reserved that provides access for customary activities. Likewise with HCV 5.1 for energy





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sources. Those users are not excluded from a unique area, and can meet their needs elsewhere is an important recognition.

### 4. Questions arising from HCV Assessments

1. Is there evidence that the more intensive fox baiting within operational coupes is having results on species abundance relative to less intensively managed areas?
2. Is the "Eradicat" baiting program delivering benefits?

### 5. Observations for improvement to the Karri Management Plan

#### 5.1. Regeneration and Public Perception

The Karri regeneration methods, while undoubtedly effective, are understood to be expensive, appear wasteful of usable fibre and are aesthetically extremely unappealing. The methods utilised trigger an understandably negative emotional response and are detrimental to the public acceptability of ongoing Karri forest management.

It appears, with reference to Figure 3, that present methods generate ideal promotional material for opponents of sustainable karri forest management.



Figure 2 - Karri Final Harvest, significant trafficking of bulldozers and exposure of mineral soil



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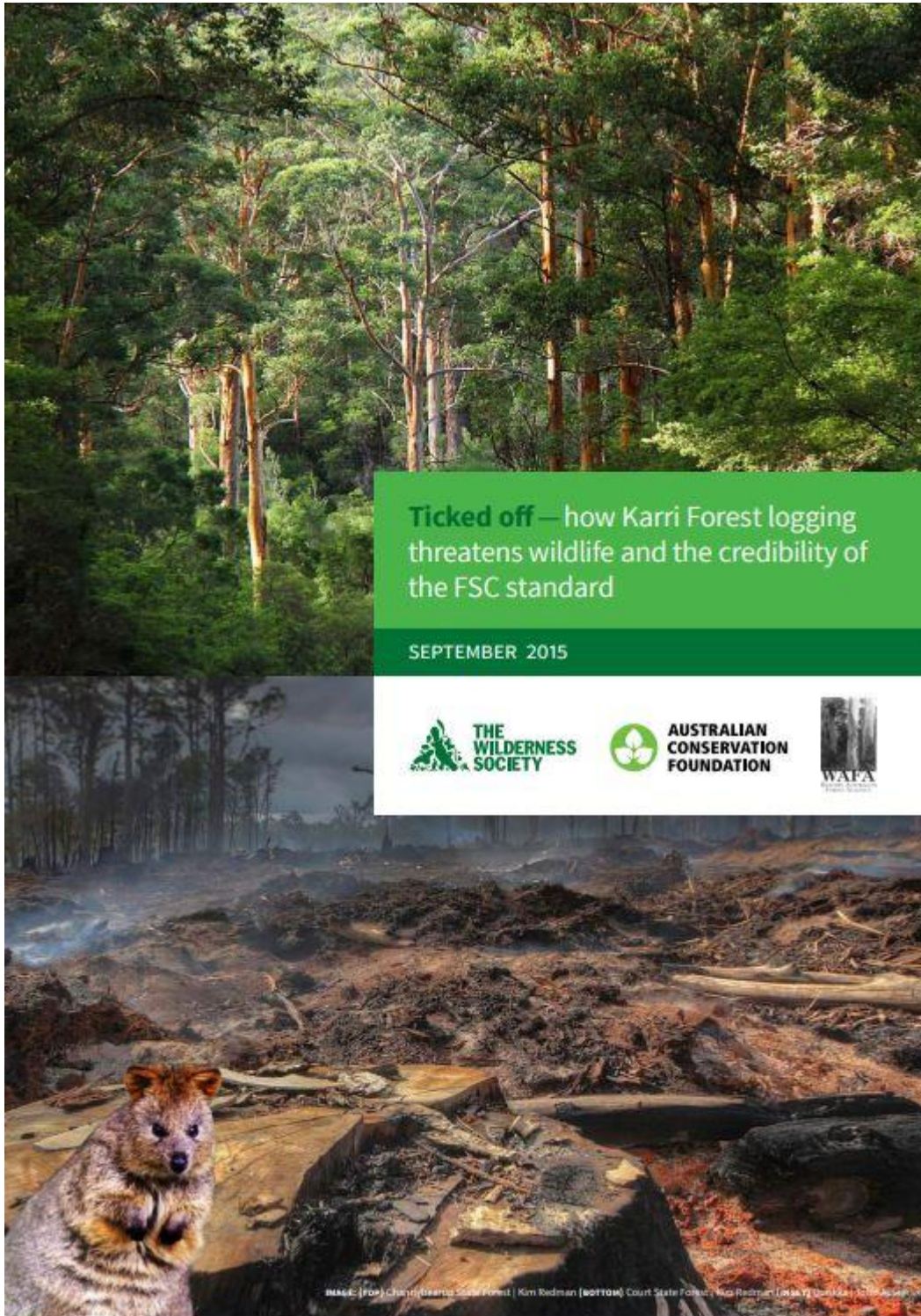


Figure 3 - Perfect promotional material for opponents of Karri forest management

The IFA recommends that the FPC investigate the utilisation of tops and large branches the creation of bio-energy feedstocks. This could generate significant savings in site clean-up costs,





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reduce the need for burning, and contribute to improving the global carbon cycle by displacing fossil fuels in energy production.



*Figure 4 - Unutilised fibre, suitable for bio-energy fuels*

### **5.2. Djarlma Plan**

The Karri FMP does not make any mention of the Djarlma plan, and how it contributes to achieving the goals of the endorsed policy document.

#### **FURTHER COMMENT AND CONTACTS**

If you have any further queries on this submission, please contact:

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