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4th August, 2011

Director General
Attention: Project Officer, Sustainable Forest Management, Crawley
Proposed amendment to the Forest Management Plan 2004-2013
Department of Environment and Conservation
Locked Bag 104
Bentley Delivery Centre, WA 6983

Dear Sir

Proposed amendment to the Forest Management Plan 2004-2013 to increase availability of karri bole logs

The Institute of Foresters of Australia (IFA) is the organisation representing Australian professional foresters. The organisation was formed in 1930, has active branches in all of the Australian states and the ACT, and is governed by an elected Board. The IFA is an advocate for better forest management in Australia, for high professional standards in forest and woodland management and for the active management of forests for all values.

The IFA supports the proposal by the Conservation Commission of Western Australia to amend the Forest Management Plan 2004-13 to increase the available volume of karri bole logs other than first and second-grade sawlogs from the current level of 117 000 m³ per annum to 170 000 m³ per annum.

This statement of support is based on careful consideration of relevant issues identified in the mid-term audit of the Forest Management Plan in 2008, and in detailed supplemental advice provided by the Department of Environment and Conservation to the Conservation Commission in May 2009. Information presented in the supplemental advice demonstrates clearly that silvicultural operations in the period 2004-2007 were consistent with sustained yield calculations for the Forest Management Plans in relation to the:

- area of regrowth forest thinned annually,
- net area thinned within harvest coupes,
- standard of application of the silvicultural guidelines, and
- yield of other bole logs harvested from two-tiered stands.

The higher than forecast yield of karri bole logs generated from harvesting operations is consistent with the maintenance of sustained yield, and with achievement of complementary goals under the Forest Management Plan for biodiversity conservation, ecosystem health and vitality, carbon storage and socio-economic benefits. Furthermore, the IFA strongly endorses the view of the Conservation Commission that the health and vitality of the regrowth karri forest could be adversely impacted if the program of commercial thinned were to be scaled back at a time when reducing winter rainfall and falling groundwater levels are contributing to increased competition for moisture in young, vigorously growing stands. The IFA notes that the Environmental Protection Authority also recognised that the higher yield of karri bole logs does not, of itself, appear to be a problem and could in fact be of some benefit to the condition of the forest.

Predictably, some elements within the conservation movement are seeking to use the proposed amendment as an opportunity to portray the native forest timber industry as being irresponsible and operating outside the conditions of the approved Forest Management Plan. These claims should be disregarded as they are patently false and not supported by the detailed information made available in support of the proposed amendment.

In conclusion, the IFA supports amendment of the Forest Management Plan to increase the available volume of karri bole logs to 170 000 m³ per annum.

David Wettenhall, MFES, B Sc Forestry, RPF, MIFA, MACFA Immediate Past Chairman. Institute of Foresters of Australia WA Division