



SUBMISSION:

'A report on progress with the implementation of the Regional Forest Agreement for the South –West Forest Region of Western Australia'.

Period 3: 2009-2014

17 January 2017

Introduction

W.A. Forest Communities Network (WA.FCN) is a grassroots organisation that supports forestry based communities. The organisation represents all facets of the forestry and engages with and on behalf of the people and organizations that benefit from forest industry. WA.FCN is strongly committed to the principles of sustainable forest management.

WA.FCN is committed to the original intent of the Regional Forest Agreement (RFA) process and content for the WA RFA, and wishes to ensure all aspects related to the social and economic benefits are recognised and maintained as a priority.

WA.FCN appreciates the opportunity to comment on the *'Report on progress with the implementation of the Regional Forest Agreement for the South West Region of Western Australia'* Period 3: 2009- 2014. (hereafter referred to as the Report)

Purpose and intent of the WA RFA

The WA RFA established a 20-year framework to manage the use of Western Australia's (WA) south-west forests to implement effective conservation, forest management and forest industry practices. The purpose of the WA RFA was to:

- identify a comprehensive, adequate and representative (CAR) reserve system and provide for conserving those areas*
- provide for ecologically sustainable forest management and use of forests*
- provide long-term stability of forests and forest-based industries.*

WA.FCN notes that one of the three objectives of the RFA process is to *"encourage job creation and growth in forest-based industries, including wood products, tourism and minerals"*.

We also note that Agreements across Australia are described as *"20 year plans that provide certainty for forest based industries and forest dependent communities."*

WA.FCN continues to support the original principles of this agreement, however contend that important parts of the original intent have not been achieved. It is regrettable that while after the original agreement was finalized and included a clause stating, as one of ten areas the WA RFA provided for, "certainty of resource access to the forest industry" that a few short years later, as a consequence of the new government's Protecting our old Growth Forests Policy' in 2001, industry and communities endured a significant setback to resource security.

Considerable focus has been placed within the adoption and review of the WA RFA on conservation, regulation and several 'soft' aspects and values, not on triggers for regional employment and investment, and growth and development of forest and wood based industries.

Indeed specific forest reservation targets have in general in WA been greatly exceeded. Hence our members feel that not only in earlier Period reviews but also in this Period 3: 2009 to 2014 report insufficient attention has been placed on the long-term stability of forest industries that in turn has a direct effect on forest based communities and families.

WA.FCN holds strongly to the imperative that industry requires the level of continuity and confidence in long-term timber supply that the RFA was designed to provide, and that would drive much needed development and investment in the industry.

This important point was noted by Glen Kile, the independent reviewer in the combined first and second (1999-2009) five yearly performance report;

“Due to policy changes by the State of Western Australia in the first half of Period 1 that increased the area of reserved forest and reduced the allowable wood harvest, the forest employment and industry development outcomes sought in the RFA have generally not been achieved ...and are unlikely to be met in future periods under the current policy settings. (Kile 2013, pp 4).

Clearly, the Old Growth Forests Policy when implemented did undermine the overall purpose and intent of the WA RFA, by exceeding the CAR reserve system established through the Comprehensive Regional Assessment.

The reserve system for almost every forest type now greatly exceeds for most forest types the standard (15% of pre -1750 forested) area set under the ‘Nationally Agreed Criteria for the Establishment of a Comprehensive, Adequate and Representative Reserve System’ for Forests in Australia.

We feel that reporting in regard to the ‘importance of RFA certainty’ was inadequate and didn’t take into account and the full suite of commitments made under the Agreement and some were not implemented through the 2004-2013 nor the 2014-2023 Forest Management Plan(s) - thus detracting from the durability and certainty of commitments made to the industry.

WA.FCN does see the expansion of the CAR reserve system based on State government election policy as simply an ‘improvement’ to Western Australia’s Forest Management System as in attachment 5, clause 48 of the WA RFA.

That the commitment made to a CAR Reserve System was quoted as ‘achieved in part’, when the level of reservation rose to nearly 62% from 44% of forest area, is perplexing when the increased level of reservation has clearly exceeded the commitment made by the Parties.

WA.FCN does however agree that the resulting reserve system provides for the ‘*protected threatened flora and fauna and ecological communities including those listed at the national level and migratory species*’, although in our view excess to requirements for this purpose.

As outlined above, sentiments such as in Clause 73 : ie intent by the Parties ‘to *enhance opportunities for further growth and development of Forest-based industries*’ and ‘*provide long-term stability for these industries*’ seem not to have been achieved. Neither the provision of “*enhanced security of access to resources for Forest- based industry for the life of the Agreement*”.

And in Milestone 5.6 of the Period 3 report, we acknowledge it stated *“Clauses 72 and 75 of the WA RFA were not satisfied as a result of implementing the reserve proposals that resulted in a reduced area of native forest available to the forest products industry.”*

WA.FCN also notes affirming statements in the Period 3 report page 55, items a) and b) about facilitating industry development that there will be *“ a) new investment, plantation development, reforestation, downstream processing, value-adding and jobs growth in wood-based manufacturing industries; (b) further introduction of new technology, enhanced utilisation of regrowth timber for sawn products, thinning of regrowth forests and more efficient utilisation of residual wood, including for the production of charcoal. “*

These are only as good as government action to stand behind and encourage communities and industry partner in achieving the intent.

Other Aspects : Log Resources, Security, Plantations, Research, Tourism

WA.FCN does support most recent efforts by the FPC to work with industry on specific sawmilling efficiency and jarrah residue recovery - hence helping the overall log turnover – as stated on page 55.

Although subsequent to the reporting period, we are concerned that the brief current window of time available to recover and market fire damaged karri timber in the Northcliffe area, even as residue, is being squandered.

In regard to Investment security Guarantees (ISG's) WA.FCN understands these were initially offered to grade sawlog contract holders to give level of security beyond the first 10 year FMP contract period. It appears these were not renewed in line with the intent of Clause 80 of the WA RFA at the commencement of the 2014-2023 FMP despite continuous requests from the industry to do so. This could be hampering new investment and thus opportunity for specific forestry dependent communities.

New investment in plantation expansion during the reporting period has not been achieved – as acknowledged in the report page 56. WA.FCN applauds the intent of the recently announced (2016) State Government's Softwood Strategy including \$21million for new plantation establishment (which of course falls outside the reporting period).

WA.FCN acknowledges the tourism and recreation initiatives outlined in the report (page 57) however our members are aware that most of the large monetary investment is in national parks, and not much toward adaptive and multiple use of state forest for these purposes. Forestry activities are a main source of engagement and employment throughout the forest, and aggressive fostering of recreational use integrated where possible with forestry is a good thing for regional communities. The Big Brook forest is a good example.

In the research field, while some of this has been positive through national initiatives and promotions, WA.FCN members have observed a rapid decline in state commitment and capacity at a local forest level, other than through Forest Check program, to boost or even maintain forest research in areas that are available for resource production, regeneration and productive silviculture.

Conclusion – to a new RFA

If the Parties wish to secure a stable and sustainable native forest industry in Western Australia that support southwest regional communities that want to participate in forest industry, it is imperative a renewed RFA is based on genuine and binding commitments to deliver certainty and security of supply, along with sustained support to the industry.

WA.FCN maintains a renewed RFA must embrace the following characteristics;

- Binding commitments between the Parties which provide security of access to resource for the forest based industry for the life of the Agreement
- Mechanisms to provide long term supply contracts (beyond the term of the current FMP) for the industry.
- Facilitate markets for non-sawlog lower grade materials to enable industry access the full volumes allowable under the FMP.
- Enable action on new investment in softwood plantation expansion.
- Introduce 'Milestones' against strong industry development commitments and rolling 20 year RFA terms.

WA.FCN appreciates the opportunity to provide feedback to the Period 3 Report on progress for the RFA.

Yours sincerely,

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Liaison Officer WA.FCN.**

References

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