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Draft Perth and Peel Green Growth Plan  
Department of Premier and Cabinet  
Locked Bag 3001  
West Perth WA 6872

## **Submission**

### **Perth and Peel Green Growth Plan for 3.5 Million**

#### **Introduction**

The Forest Industries Federation WA (FIFWA) is the association for the timber industry in Western Australia. FIFWA represents a membership that includes almost all the major companies and businesses that operate in the WA timber industry, including commercial plantation growers, harvest and haul operators, and processors in both the native and plantation sectors.

We appreciate the opportunity to comment on the *'Draft Perth and Peel Green Growth Plan for 3.5 million'*, (Hereafter referred to as 'The Plan') to help shape government policy settings to support integrated land use planning. FIFWA commends the initiative of the State Government to provide a comprehensive plan to integrate environmental protection and land –use planning, and to streamline Commonwealth and State environmental approval processes within the assessment boundary of The Plan.

FIFWA Members have a particular interest in the harvesting and management of pine plantations and we take this opportunity to provide comment on the needs of the local timber processing industry and ways in which The Plan could provide a greater level of environmental protection, whilst also ensuring the viability of a valuable local manufacturing industry into the future.

## **1. The value of the plantation processing industry in WA**

The plantation industry is an important industry sector, which employs over 3,750 West Australians directly and generates on our estimates another 12,000 indirectly.

There is well in excess of \$1 billion worth of existing investment in plantation based primary processing infrastructure in WA, including the only Australian LVL manufacturer, Australia's largest particle board plant, significant sawmilling facilities which provide structural pine to the local construction industry, pallet and packaging manufacturers, timber treatment plants and several key port processing and handling facilities.

The economic diversity provided by the industry is particularly significant in regional areas where much of the industry is based.

## **2. The necessity of maintaining the plantation estate**

The cornerstone of the industry is the resource. The Gnangara, Pinjar and Yanchep pine plantations were established as a part of a far sighted plan of successive State governments, over sixty years, for the purpose of timber production and therefore enabled by the utilisation of the local resource, value added manufacturing to be developed in the State. This purpose was fulfilled by the construction of the \$115 million Wesbeam LVL mill in Neerabup in 2004.

Due to concerns of declining rainfall, plantations usage of water (which is not significantly more than native species), lobbying by market gardeners and urban expansion pressures, the State government made the decision in 1996 to clear most of the pines from the Gnangara Mound.

It is worth noting however that in October 1996 Cabinet also gave in principle approval to the objective of establishing 500,000ha of Maritime Pine in the intermediate rainfall (400-600 mm) zone of the agricultural region. Specifically, Cabinet authorised the FPC (then CALM), in consultation with the State Salinity Council, to undertake a commercial Maritime Pine afforestation program of up to 150,000ha on private land over 10 years. The background to this approval included the recommendation in the State Salinity Action Plan for the establishment of 3 million hectares of deep rooted perennials, and the need for a timber resource to offset the planned liquidation of Maritime Pine plantations on the Gnangara Mound. However, this plantation establishment in the mid –west stalled well short of the intended target.

Unless the offset plantations continue as planned the decision to liquidate the pines on the Gnangara Mound will result in a total loss of an essential 23,000ha of pine estate by 2020 (27% of the total WA Pine estate).

It is a major concern to FIFWA that these plantations are being harvested and are not being replaced by offset plantings of equal volume. Establishing new plantations within an economical transport distance of processing facilities (150km), is absolutely necessary to support globally competitive manufacturers beyond 2030. Maintaining (as a minimum) the current total plantation estate is critically important to supply the local WA processing industry.

Since the 1996 Cabinet decision to liquidate the pines on the Gnangara Mound it has been determined that the Gnangara, Pinjar and Yanchep pine plantations provide up to 57% of the food source for the Carnaby's Cockatoo on the Swan Coastal Plain (as much of their native foraging habitat has been lost to urban growth and development), this was not understood at the time of the decision to liquidate the estate. It should also be noted that prior to the 1996 decision the pines were managed on a sustainable basis, clear-fell areas were re-established and the constant state of the managed forest provided both sufficient cockatoo foraging habitat and a viable forest area for local high value added manufacture.

The Plan states;

*“In order to avoid some of the impacts of harvesting and provide a continuous food source for the Carnaby's cockatoo 5,000 ha of pines will be replanted in the Yanchep area” .pp.2 Draft Action E.*

And

*“Considering the prime objective of the 5,000ha of pines is to provide food for the Carnaby's cockatoo, the pines will not be planted as a traditional plantation”. pp.4 Draft Action E.*

This position as stated in The Plan represents a missed opportunity for the State on three fronts;

- (a)** 5,000ha is not enough retained plantation area to off-set the 23,000ha being liquidated from the Gnangara, Pinjar and Yanchep plantations to maintain sufficient foraging habitat for the cockatoos.
- (b)** without a commercial outcome it is unlikely any more plantations will be established which would benefit the cockatoos
- (c)** It is unlikely that pines which are not managed as “traditional plantations” will yield resource that will support the valuable timber processing industry, with which the State holds 3 separate State Agreement Acts for supply.

The Plan also proposes to set aside another 116,000ha of state forest, on top of the existing 1.32 million ha of native forest already in conservation reserves, which offers no additional foraging habitat for the Cockatoos.

### **3. Disadvantages of landscapes management for single purpose outcomes.**

Landscapes dedicated to a single management objective are in FIFWA's view inefficient and often ineffective.

Using our WA native forests as an example the problem we see with conservation reserves is that forests which need to be actively managed to adapt to threats like fire, pests, weeds and climate change are left essentially unmanaged, as there is no revenue generated to manage them effectively on an ongoing basis.

Because of the lack of effective management, much of the existing heavily stocked native forest conservation reserves are as a result, suffering from drought, preventing dam recharge, being severely damaged by bushfires and incubating such bushfires until they emerge uncontrollable into State and private assets.

FIFWA maintains forests are not static museums with values that can be locked up and protected forever. They are dynamic ecosystems that are resilient to moderate disturbance, but susceptible to severe fire and drought. Sustainable forest management actively balances the social, environmental and economic values of the forests. This balance is absent in conservation reserves.

FIFWA questions the value of adding 116,000 ha of conservation reserve to the 1.32million ha of existing native forest conservation reserves. These forests already exist regardless of their 'tenure status' and therefore are already available to the cockatoos. The 116,000ha does not represent additional foraging habitat. Changing the land tenure status to a conservation reserve is likely to only result in more undermanaged native forest for the State. To increase the forage value of the 116,000ha significant additional funding will be required. As an example FIFWA is aware of one project to restore banksia woodland near Jandakot airport budgeted to cost over \$17,000 per hectare, which would prove to be an astronomical expense to the State if applied over the 116,000ha, but without which, there would be no added benefit of the reserve.

The proposal to maintain 5,000 ha of pine conservation forest in the Pinjar region is equally of limited value in FIFWA's view, unless these plantations are incorporated into a larger sustainably managed plantation estate, balanced for triple bottom line outcomes.

#### **4. Advantages of integrated landscape planning for multiple management outcomes**

Maintaining a larger pine plantation in the Gnangara/Pinjar and Yanchep region of at least 10,000ha and by establishing a full offset of the liquidated 23,000 ha as a minimum in the Midwest and South West regions would increase the total foraging habitat for the cockatoos and provide valuable timber for the local manufacturing industry.

The costs of establishing a larger plantation estate would be recovered (as has been the case in the past) through the sale of timber on rotation to the processing industry and could be enhanced by attracting private investment in pine plantation establishment via joint venture arrangements with the State.

Increasing the total area of commercial pine plantations within the assessment boundary of The Plan represents a far more effective and economically viable offset arrangement than the current proposal to establish a small area of pines as a one off arrangement.

#### **5 Conclusion and Recommendations**

FIFWA is supportive of the initiative to streamline Commonwealth and State environmental approval processes within the assessment boundary of the Perth and Peel Green Growth Plan. FIFWA is also supportive of the initiative to integrate environmental protection and land-use planning.

However we feel the plan as it stands, falls short in achieving this second stated objective, because planning for a mere 5,000ha of pines to offset the 23,000ha of pines being liquidated and simply renaming 116,000ha existing State forest as 'conservation reserve', will not prevent the existing population of cockatoos from succumbing to starvation.

FIFWA encourages the State to take a broader level of assessment and to give due consideration to the commercial opportunities available to establish a larger plantation estate to support the timber processing industry post 2030 and to provide a self-funding and adequate foraging habitat for the Cockatoos into the future.

We again would like to thank you for the opportunity to comment on the Perth and Peel Green Growth Plan for 3.5 million and should you wish to discuss any aspect of our submission further please contact Melissa Haslam on (08)9472 3055 or via email on [info@fifwa.asn.au](mailto:info@fifwa.asn.au).

Sincerely



Melissa Haslam  
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