

Submission – 2 February 2018
2018 Harvest Plans - Forest Products Commission

Forest Industries Federation WA (FIFWA) is the industry association for the timber industry in Western Australia. FIFWA's membership encompasses both the native and plantation forestry sectors, harvesting contractors and timber processors.

WA's native forest industry is valuable, generating \$220 million annually and almost 900 jobs in WA (Socio-economic impacts of the forest industry: Western Australia, Schirmer et al., 2017). Resource security is a high priority for the industry. Continued supply of native forest products, particularly first and second grade jarrah and karri logs, is critical. FIFWA therefore appreciates the opportunity to provide the following comments.

Resource security

In the southern supply zone, the net plan area has increased by 3810 ha compared to the 2017 harvest plan. On balance, the estimated jarrah and karri sawlog volumes have both increased. This is encouraging.

However, in the northern supply zone, the total net plan area has increased by 3934 ha compared to the 2017 harvest plan, but the total volume estimated has decreased by 9810 m³. Understandably these are estimates only and as noted, additional sawlog volume may be generated from clearing operations. However, these amounts suggest that numerous low yielding coupes have been included on this harvest plan. This will have a significant negative impact on the timber industry. Lower yielding blocks cost the industry more to harvest, producing less volume and less profits. FIFWA supports sustainable forest management and recognises that the lower yielding blocks may need to be harvested. Still, it is important to the industry to maintain a fair mix of coupes on the harvest plans.

Removal of valuable high yielding blocks from the Harvest Plans

FIFWA is concerned that coupes which have been approved and previously included in harvest plans have been removed. The northern supply zone harvest plan reads as though Arcadia 03, Arcadia 04 and Mungalup 04 have been removed from the plan because they are within the boundaries of possible extensions to the Wellington National Park. FIFWA strongly objects to this proposal to extend the park leading decision making, it is preemptive. It is an assumption that the proposal will be successful, and an assumption should not impact the harvest plan.

The inclusion of Arcadia 03, Arcadia 04 and Mungalup 04 would provide up to 1460 ha of nominal net area, with an estimated volume of over 10 000 m³. Previous coupes in Arcadia block and surrounding areas have produced high quality sawlogs. Arcadia block contains high yield forest. If high yield blocks are to be removed, then they must be replaced by similarly high yielding blocks. Mills cannot take their contracted volumes from low yielding areas (which are synonymous with poorer quality sawlogs) and transport the timber over greater distances without undermining the viability of their businesses.

Removing coupes from harvest plans will set a precedent encouraging anti-timber industry groups to protest more coupes and more often. This could undermine the long term sustained yield projections of the FMP 2013-2023 and ultimately reduce the allowable cut available to industry. The FMP process is extensive, requiring years of consultation with experts and exhaustive research. If valuable coupes (or indeed any coupes) can be removed from harvest plans so easily, what is the point?

Removing coupes from harvest plans reduces flexibility to deal with unforeseen events like wildfires destroying listed coupes. It also negatively impacts our members by disrupting their schedules and contracts.

Simply replacing controversial coupes with similarly sized ones is not enough. Potentially, this may be acceptable in situations such as a significant wildfire destroying an allocated coupe; but this is not a long-term, sustainable option. This again disrupts our members' schedules and contracts.

Based on communication with Ministers, other government representatives, and the lack of publicly released information confirming the proposed extensions to Wellington National Park, our members have been led to believe that their businesses should expect to proceed as usual. The explanatory note regarding these coupes in the northern supply zone suggests otherwise and will encourage anti-timber groups.

These coupes, or indeed any of the coupes included in the proposed expansion should not be promised to anti-timber groups.

Transparency

Transparency is a key issue for the timber industry. FIFWA notes that the 2018 harvest plans have been made available to the public, as required by the FMP 2014-2023. However, the format of the document listing the coupe details should be clearer, so that the reader does not have to calculate the subsection totals for themselves. This will allow a reader to more quickly compare the sections and increases the accountability of the document (and hence the timber industry) at a glance.

Consistency is also important when promoting transparency. In the 2017 northern supply zone document, the total net plan area and the jarrah sawlog volume grades 1 and 2 for the coupes not associated with mining operations are not included in the total. In the 2018 northern supply zone document, they are included. This could easily be overlooked by a casual reader and could even be inferred as untrustworthy.

An explanatory note regarding the 0 m³ jarrah sawlog volume predicted for Nanga 03 (new coupe, northern supply zone) would also improve transparency for the general public.

FIFWA is concerned with what appears to be an open ended public comment period on the harvest plans. If public comment is accepted throughout the year, and if those comments lead to further adjustments of the coupe list, this will negatively impact schedules and contracts.

Summary

Removing coupes and adjusting the coupe list to accommodate anti-timber groups threatens resource security for the native timber industry; could set a precedent for such actions; and could ultimately undermine the sustained yield calculations set out in the FMP 2013-2023.

FIFWA strongly objects to the removal of Arcadia 03, Arcadia 04 and Mungalup 04 coupes and calls for their return to the 2018 Harvest Plan (and the Three-Year Indicative Plan 2018-2020).

Once again, thank you for the opportunity to comment on the 2018 Harvest Plans. FIFWA is supportive of the FPC's sustainable management and development of WA's timber industry and hopes that the FPC will promote resource security for the native timber industry through the 2018 harvest plan.

Sincerely,

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