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Dear Mr Hatt

SUBMISSION TO THE DRAFT STATE SUSTAINABILITY STRATEGY

Thank you for your letter of 2 October 2002, and for providing a copy of *Focus on the Future: The Western Australian State Sustainability Strategy, Consultation Draft*.

The Department has reviewed the above document, and I am pleased to provide the attached comments on the draft State Sustainability Strategy.

Sustainability is a principle that is integral to the Department of Conservation and Land Management's responsibilities and activities. The Department's Mission is:

"In partnership with the community, we conserve Western Australia's biodiversity, and manage the lands and waters entrusted to us, for their intrinsic values and for the appreciation and benefit of present and future generations".

The Department's comments are based upon its role in implementing sustainability objectives in Western Australia; they identify areas within the draft Strategy that require further consideration and clarification in order for the final document to be an effective and useful tool to guide the State into adopting a sustainable future.

As you would be aware, the Government has released for comment the Consultation Paper on the proposed Biodiversity Conservation Act. This paper identifies a series of proposed new initiatives in biodiversity conservation legislation that will be relevant to the preparation of a final Sustainability Strategy. An overriding weakness in the draft Sustainability Strategy is the relative sparseness of its consideration of the role biodiversity conservation plays in any sustainable society. The ongoing cycle of habitat degradation and species loss cannot be permitted to continue. Furthermore, there is the need to consider in all areas of development the ecosystem services provided by biodiversity. A good reference for this concept is the paper "Setting Biodiversity Priorities" (Hugh Possingham, Sarah Ryan, Jenny Baxter and Steve Morham), prepared for the Prime Minister's Science, Engineering and Innovation Council in 2002 (copy attached).

The Department notes that the finalisation of the Strategy will require significant additional input from Departments to ensure that it is integrated with statutory obligations, government policy, agency strategic plans, and budget outcomes.

I believe that the Department can make a significant contribution to the finalisation of the Strategy and subsequently to its implementation, and I look forward to the challenges ahead.

Yours sincerely

Keiran McNamara
ACTING EXECUTIVE DIRECTOR

7 March 2003

Att.

COMMENTS ON THE DRAFT STATE SUSTAINABILITY STRATEGY

DEPARTMENT OF CONSERVATION AND LAND MANAGEMENT

FRAMEWORK OF THIS SUBMISSION

The following comments are provided by this Department for the preparation of the final version of the State Sustainability Strategy. The submission is divided into sections, which mostly follow the structure of the draft Strategy. Comments under the first section (Implementation Framework of the Strategy) provide feedback and recommendations on how the Department believes the implementation of the Strategy as a whole can be improved. The remainder of the submission provides comments on the draft Strategy according to its six objectives and priority areas within the objectives.

IMPLEMENTATION FRAMEWORK OF THE STRATEGY

The draft State Sustainability Strategy lacks a clear implementation framework that indicates the timeframe, resources, responsible agencies and priorities for the actions that are proposed. Below is a discussion of how the implementation framework could be improved.

Proposed Actions

It is fundamental that the State Sustainability Strategy maintains consistency between objectives, proposed actions and indicators/targets. For instance, there are inconsistencies in this regard for the priority area *Maintaining our Biodiversity*. The second objective aims to protect biodiversity through reservation and off-reserve management, however, there are no actions identified to achieve this objective. This occurs throughout the document. It is highly recommended that the “In short...” sections in the draft document be reviewed for the final Strategy, so that the objectives relate directly to the proposed actions and targets/priorities, therefore ensuring that consistency is maintained.

It would be useful if, following consultation and agreement with Ministers and agencies, the final Strategy indicated the agency/organisation/institution responsible for carrying out the proposed actions for each priority area. This will not only inform agencies of their responsibilities under the Strategy, but also indicate to the community the roles of different agencies in implementing the Strategy.

Indicators and targets

The draft State Sustainability Strategy identifies a number of indicators and targets for each priority area. It is important to note that indicators and targets are different measures, and it should be identified in the Strategy whether a component will be measured against a target or an indicator. A second point to note is that both indicators and targets are *measurable* or *quantifiable* factors. The draft Strategy does not provide clearly quantifiable indicators or targets. Existing indicators/targets need to be reviewed and re-worded so that they can be measured, in order to assist in evaluating the success of the implementation of the Strategy. A general timeframe should also be developed for achieving the targets of each priority area. This will assist in avoiding any unreasonable expectations from the community with regard to the timeliness of outcomes of the Strategy.

The current targets/indicators in the draft Strategy are generally very broad, and focus on *processes* rather than *outcomes* for sustainability. For example, one indicator for the priority area *Sustainable Fisheries and Aquaculture* is “number of fisheries that have successfully undergone sustainability assessments” (page 107), which focuses on the process of

sustainability assessment, rather than the outcomes of the assessment. The usefulness of the indicators throughout the Strategy would be enhanced by providing *outcome*-based indicators and targets that are quantifiable. For the same section, suggested indicators are “no net loss of finfish diversity as a result of human activity” and “no reduction in protected finfish species abundance as a result of human activity”. Similarly, the Strategy identifies the other indicator for this priority area as the “area of reserves for the conservation of marine biodiversity in each marine bioregion”. This would be enhanced by adding an outcome-based target such as “no loss of species diversity and abundance within marine conservation reserves as a result of human activity within these reserves”.

SUSTAINABILITY AND GOVERNANCE

Sustainability and Governance

This Department is actively carrying out actions to improve the sustainability of its operations. At present, the Department purchases 10% green energy from the interconnected electricity grid and will review this percentage each year. The Department currently replaces 25% of its six-cylinder passenger vehicle fleet with LPG-powered vehicles each year. An energy audit has recently been carried out of the Department’s State Operations Headquarters in Kensington. The implementation of the recommendations that resulted from this audit will reduce costs and greenhouse emissions by 6%. This energy audit program is presently being extended to other Departmental sites.

The Department is keen to improve the sustainability of its operations State-wide, and to adopt the relevant strategies identified in the State Sustainability Strategy. It is suggested that a model or example of a Sustainability Action Plan required by agencies be provided, so that agencies have an indication of what is involved in carrying out this task, and the resources required.

Sustainability Assessment

This Department currently plays a significant role in providing input to development/land use proposals via planning processes and via the Environmental Impact Assessment (EIA) process, implemented by the Environmental Protection Authority. It is considered that the EIA process is an effective means of ensuring that environmental implications are considered and accounted for in development projects. The concept of sustainability assessment, in principle, is an innovative means of coordinating social, environmental and economic implications simultaneously into the decision-making process. However, in reality, it is questionable as to what degree and by what means such a process would be carried out.

The integration of the social component into decision-making for development proposals is much needed. However, it should be recognised that the concept of sustainability assessment, without detailed information about the process (such as triggers, the assessment process, who will be responsible for implementation), will be open to scrutiny. It is possible that the idea of ‘triple bottom line’ (that is, considering economic, social and environmental impacts simultaneously) will undermine the current EIA process, and reduce the degree to which the environment is considered in decision-making. This would have serious implications, given that the current EIA process in Western Australia has developed over many years to ensure that environmental impacts of projects are given serious consideration, and that the Minister for the Environment and Heritage has power in the decision-making process for project approvals.

It is important that before the Government commits in the State Sustainability Strategy to implement a sustainability assessment process, clarity is provided on the following:

- the agency responsible for administering and implementing the assessment process;
- how sustainability assessments made by the Environmental Protection Authority, Department for Planning and Infrastructure and Department of Treasury and Finance will be integrated;

- triggers for proposals to be subject to sustainability assessments;
- details of the process itself; and
- how sustainability assessment will link to/complement/substitute for the current EIA process implemented by the EPA.

These points should be the subject of inter-agency discussions in order to derive an effective, streamlined process for adequately accounting for the 'triple bottom line'. It is important to emphasise that the current EIA process is relevant and valid and should not be undermined in its power in decision-making.

Transitional arrangements for sustainability assessment

The draft Strategy recognises that “*Agencies will need to develop a social, environmental and economic checklist and a range of techniques that can help to integrate these*” (page 38). It is essential that for sustainability to be adequately accounted for in decision-making, government agencies take this approach outlined in the Strategy. This Department has adopted a three year strategic planning process in its determination of funding priorities for its parks and visitor services output. This process ensures that projects are assessed against a comprehensive checklist, which already includes social, economic and environmental considerations. This is an effective approach that the Department will be aiming to apply at the Departmental level for all of its outputs.

Strategic planning processes *between* government agencies should also incorporate an assessment against social, economic and environmental considerations. For instance, the Trails Reference Panel, which consists of members of a number of government agencies, will develop a framework under which future trails development in WA will be based. It is imperative that the Panel develops sustainability criteria against the ‘triple bottom line’, and ensures that the government agency responsible for each of the strategies is compliant in its assessments and recommendations. Before a clear, well-defined and agreed sustainability assessment process has been developed for State-wide projects, plans, policies and programs, all agencies should adopt an approach to consider the ‘triple bottom line’ in decision making at all levels, as part of the State Sustainability Strategy.

Indigenous communities and sustainability

This Department supports the vision, objectives and action statements outlined in this priority area of the draft State Sustainability Strategy. In particular, the Department has implemented an indigenous training and employment strategy aimed at achieving an Aboriginal workforce of 10-15% within ten years, and will undertake pilot indigenous country management programs with Aboriginal organisations.

Consistent with the objectives of the State Sustainability Strategy, Cabinet approved a package of initiatives on 18 February 2003 for the establishment of:

- an indigenous protected areas program;
- joint management of lands and waters managed by the Department;
- cultural heritage programs; and
- training and employment initiatives leading to capacity building with Aboriginal communities.

The draft Strategy nominates Steve Kinnane’s background paper, *Beyond the Boundaries – Exploring Sustainability Issues within a Regional Focus*, as the preferred strategy to achieve sustainability for Aboriginal communities. The Strategy nominates short, medium and long-term strategies to use Community Ranger Schemes, also known as Indigenous Country Management Programs, as the major initiative in achieving sustainable solutions to Aboriginal community development.

This Department does not decry the role of such initiatives for Aboriginal community development. However, Steve Kinnane’s background paper contains some very disconcerting suggestions that have the potential to alienate the Government from its core environmental obligations and commitments. While the Department will not critique the background paper, as it is regarded as only a background paper that stimulates informed debate and consideration of the issues, it does believe that the paper is not aligned with the established Westminster system of Government in Western Australia.

The aspirations presented on page 25 of the background paper are unattainable and more importantly, economically and environmentally unsustainable. The dismantling of this Department and the devolution of its responsibilities to Aboriginal entities is based on the

premise of the independent sovereignty of indigenous people and their right to manage the land according to indigenous law. This is spelled out in the following quote from the paper:

“Within a whole-of-government approach the resources that would traditionally have been based in (the Department of) Conservation and Land Management would be devolved to regional Aboriginal Country Management programs. These would likewise operate in a collaborative manner with other mainstream conservation and resource management agencies, but in a role of management of recognised Indigenous Countries, rather than as a consultative arrangement.”

This Department is concerned that the protection of biodiversity and management of lands for the benefit of the Western Australian community could be seriously jeopardised by such an approach. The Department has adopted a non-adversarial approach which seeks to bridge the gap between traditional Aboriginal customs and responsibilities for caring for the country and the need to address the contemporary threatening processes introduced through European settlement. The Department believes that this approach to land management should not be compromised.

CONTRIBUTING TO GLOBAL SUSTAINABILITY

Biodiversity conservation

Recognition of the intrinsic value of biodiversity in Western Australia, and the need for its conservation is a fundamental responsibility of this Department, and will be the Department's main contribution to the implementation of the State Sustainability Strategy. It is recognised in the State Sustainability Strategy that biodiversity conservation is a “foundation principle”, which establishes the basis of sustainability. Despite its key role in meeting sustainability objectives, the maintenance of biodiversity comprises a very small component of the overall Strategy. It makes up only one of the 42 priority areas in the Strategy. Being a foundation principle for sustainability, the maintenance of biodiversity should come across strongly in the Strategy and be a principle guiding other priority areas. The linkages between biodiversity conservation and sustainability also need to be clearly defined; identifying the benefits of maintaining biodiversity, and allocating objectives and action items accordingly.

It is recommended that at the very least, the priority area *Maintaining our Biodiversity*, be retained as a section committed to the recognition, protection and conservation of the State's biodiversity values. An additional priority area in Chapter 5: *Sustainable Use of Natural Resources* should also be created which is committed to sustaining the values and managing the threats of the State's biodiversity values. The section in this submission, *Sustainable Use of Natural Resources*, discusses this point further.

Maintaining our Biodiversity

On page 81, the draft Strategy lists the projects that are being carried out in Western Australia according to its international biodiversity obligations. The State's contribution to the Millennium Seed Bank Project for flora conservation, of the Royal Botanic Gardens, Kew, south of London, should be recognised in this list. Already the State has contributed seeds to the project from a number of poorly known species as a cooperative effort from this Department and the Botanic Gardens and Parks Authority.

Threatened species and ecological communities

The recovery of threatened species and ecological communities is a key responsibility of this Department, and is viewed by the Government and the community as of great importance for the conservation of the State's biodiversity. However, there is little emphasis in the draft Strategy on the importance of protecting and recovering the State's threatened species and ecological communities. In the priority area *Maintaining our Biodiversity*, the draft Strategy identifies an indicator/target as “Number of threatened species and ecological communities brought back from the edge of extinction”. It is noted that there is no supporting objective or

action designated to the protection of threatened species and communities. It is fundamental that consistency be maintained between objectives, actions and targets in the State Sustainability Strategy. It is pointless to identify a target for the recovery of threatened species and communities, without allocating an objective or any action items.

Furthermore, this target is largely unquantitative and vague. It is difficult to define and measure “edge of extinction”, making the phrase inappropriate as a target or indicator. This Department prepares and carries out recovery plans for high priority threatened species and ecological communities. This should be recognised in the Strategy, and proposed action items allocated to build upon the actions that are already underway, such as “develop recovery plans for all listed threatened species and identified threatened ecological communities”. A more appropriate target may be similar to “rate of recovery of threatened species and ecological communities covered by recovery plans compared with predicted rates”, which is both specific and measurable.

Responding to Greenhouse and climate change

The link between the Sustainability Strategy and the WA Greenhouse Strategy, which is also in preparation, would be clarified and strengthened if the structure of this section was parallel to that of the Greenhouse Strategy. Such a parallel structure is suggested at the beginning of the section, in which the highlighted text immediately below the title (page 86) states the focus of the four content elements of the Greenhouse Strategy. It would be useful to continue allusion to these elements throughout the section, and reference to the process elements (government leadership, national and international policies, research and community and awareness) might also help create links between the Strategies.

As the section notes, the Greenhouse Strategy is currently being developed, and the greenhouse content of the final Sustainability Strategy will reflect the initiatives currently being developed for the Greenhouse Strategy. With regard to the specific actions proposed in this section in the draft Sustainability Strategy:

- 2.17: It would be appropriate to broaden the discussion of a carbon sequestration facility beyond the Forest Products Commission to ensure that carbon sequestration by any Government Department is recognised and can be applied to promote effective and appropriate environmental and community outcomes.
- 2.21: A climate adaptation strategy must address the conservation needs of natural systems, but must also go well beyond this to address health systems, water supply systems, public and private infrastructure, agricultural and plantation activities and a range of other matters. Regarding the detail of this particular proposal, it would be appropriate to remove reference to the CSIRO Healthy Country initiative.

This section would be considerably strengthened by ensuring that there was at least one effective action and useful indicator for each major element of the Greenhouse Strategy.

SUSTAINABLE USE OF NATURAL RESOURCES

It is recommended that Chapter 5: *Sustainable Use of Natural Resources* be renamed to *Sustainable Natural Resource Management*. The chapter deals with a broad range of natural resource management issues, from improving the sustainability of activities such as fisheries, forestry, agriculture and mining, to the management of the State's natural resources such as marine, coastal and aquatic systems. Tourism is included in this section, yet it is not a natural resource. Mining is addressed in this chapter under the priority area *Sustainable mining and petroleum production*, yet neither mining nor the production of petroleum are truly sustainable practices; they utilise non-renewable natural resources. The recommended title of this chapter would better encompass the broad subject of natural resource management across the State.

Sustainable biodiversity

The State Sustainability Strategy fails to identify the management of threatening processes as a significant means of sustaining and conserving biodiversity. Factors such as grazing, mining, weeds, feral animals, dieback and other exotic diseases, salinity and inappropriate fire regimes are major threats to Western Australia's biodiversity. The control of foxes and feral animals is identified in the Strategy in relation to the impacts on agricultural productivity, but no reference is made to the impacts on biodiversity. The damage caused by weeds, foxes and other feral animals to biodiversity is a particular problem that is of State-wide significance. In order to adequately sustain biodiversity, and to ensure sustainability objectives are met for future generations, it is necessary that mechanisms be in place to manage and control these threatening processes. This should be identified in the State Sustainability Strategy under an additional priority area named *Sustainable Biodiversity*, and objectives and resources allocated accordingly.

The State Sustainability Strategy also needs to recognise that there is an inevitable cost to the environment and to biodiversity as a result of the above threatening processes and land use developments. This cost may be via the drain on the resources of conservation agencies from managing the threat or dealing with land use projects, and the uncosted loss of ecosystem values and services. In dealing with these environmental costs, the State Sustainability Strategy needs to recognise the concept of 'no net loss to biodiversity' and the application of environmental offsets in decision-making for land use projects that may threaten biodiversity values.

Spatial and temporal scales of sustainability

In the sections on the sustainable management of natural resources, the State Sustainability Strategy should provide a brief discussion on the spatial and temporal scales required to achieve sustainability outcomes, as this will be critical in providing an appropriate framework for management and evaluation.

For example, for the conservation of marine biodiversity an appropriate spatial management unit to assess ecological sustainability is at the ecosystem level. Similarly, spatial management scales should be identified for achieving various objectives throughout the Strategy. The temporal scale also needs to be defined in order to assess whether sustainable outcomes have been reached, particularly where historical activities have resulted in major impacts, and hence the 'natural state' has changed or no longer exists. Without these 'benchmarks', any assessment of ecological sustainability is of limited use. That is, a distorted view of sustainability may arise by accepting that *current* environments that have been modified by past human activities are a satisfactory benchmark for sustainability.

For example, the impacts of trawling on benthic communities diminish over time and the original habitats are replaced with 'new', highly modified habitats. An assessment of the 'threat to ecological sustainability' of a trawl fishery (as measured by the amount of by-catch) at the beginning of the fishery would be classified as 'severe' in many cases. By contrast, if the same measure was used after several decades of trawling when much of the benthos had been removed, the 'threat to ecological sustainability' would be assessed as low (because the by-catch is low). This example illustrates the need for temporal benchmarks that give meaning to the concept of ecological sustainability.

Sustainable use of bioresources

Chapter 5 of the draft State Sustainability Strategy fails to address the sustainable use of the State's biological resources. Bioresource industries that are prominent in Western Australia include beekeeping, wildflower picking, seed collecting, firewood collecting, kangaroo harvesting, and emu and crocodile farming. Under existing State legislation, licensing systems exist to control the use of these biological resources, administered by this Department. The

proposed new Biodiversity Conservation Act will aim to improve management of the ecologically sustainable use of native biota.

The Sustainability Strategy should recognise the impacts that these activities potentially have on the conservation of the State's biodiversity, and the intervention that is required to ensure that practices remain sustainable. It would be useful if this was made a priority area within the Strategy, which addresses the management issues associated with the sustainable operation of the industries, and proposed actions and targets/indicators to guide the sustainable management of the industries into the future.

Sustainable fisheries and aquaculture

Under the *Wildlife Conservation Act 1950*, all native flora and fauna is protected unless there are specific legislative provisions that allow for the harvesting of certain species (e.g. kangaroos and wildflowers). In the marine environment, the *Fish Resources Management Act 1994* overrides the powers of the Wildlife Conservation Act, in that the aquatic flora and fauna (except for aquatic mammals, reptiles, birds and amphibians) can be harvested for recreational or commercial purposes unless specific legislative restrictions are imposed on the take of certain species. Consideration will be given in the development of the new biodiversity conservation legislation to ensure that an appropriate balance is struck between fisheries resource protection and biodiversity conservation.

The level of knowledge of marine species diversity, distribution and ecology in this State is quite limited. A sound level of knowledge is essential to ensure that harvesting activities are ecologically sustainable. Without this sound scientific basis to ensure that marine flora and fauna can be managed in an ecologically sustainable manner, there should be an emphasis in the State Sustainability Strategy on the protection of marine diversity, rather than a default position of allowing extraction.

Sustainable forestry and plantations

This Department supports the management of the State's forests on an ecologically sustainable basis. All State forests and timber reserves, which are vested in the Conservation Commission, are managed on its behalf by this Department according to an approved forest management plan, and the new forest management plan currently being prepared is explicitly based on the principles of ecologically sustainable forest management. As stated in the draft State Sustainability Strategy, a Draft Forest Management Plan was released in 2002 for public comment. The text in Section 5 of the Strategy, *Sustainable use of natural resources: Sustainable forests and plantations* (pages 108-111), will be outdated by the time of release of the final document. Attached are changes tracked on the text of the draft Strategy in this regard (pages 108-111), which are current at the date of this submission. It is recommended that this Department be contacted prior to the release of the final Strategy to confirm that the text is current at the date of release.

This section in the Strategy recognises the threat posed by *Phytophthora cinnamomi* on the sustainability of forests in the south-west of the State. Action 3.23 proposes the development of a dieback strategy to control the spread of *P. cinnamomi* throughout the south-west. While dieback is a serious threat to jarrah forests, it is not a threat that is specific to forest ecosystems; it also impacts significantly upon shrubland and woodland ecosystems in the south-west. In respect to the wider scope of the threat, it is recommended that managing the threat of dieback to biodiversity be addressed in the proposed section on sustainable biodiversity (see above). Objectives, action items and indicators/targets should be allocated to this issue accordingly.

Sustainable mining and petroleum production

There is no recognition in the State Sustainability Strategy of the Government's policy on mining in national parks and nature reserves. Given that there are considerable mineral and

petroleum interests on conservation lands managed by this Department and proposed conservation reserves, the State Sustainability Strategy should recognise the Government's policy to prohibit mineral and petroleum exploration and mining in national parks and nature reserves. Mining and petroleum activities impact on biodiversity conservation values, and therefore need to be subject to appropriate assessment and conditions.

Sustainable Coastal and Marine Environments

There is overlap in the draft State Sustainability Strategy between the two priority areas, *Sustainable Coastal and Marine Environments* and *Sustainable Fisheries and Aquaculture*. The fisheries and aquaculture section focuses on sustaining the State's fish resources, however, it also includes components on the protection of marine biodiversity and the establishment of marine parks and reserves. While marine parks and reserves do assist in protecting fish resources, their primary purpose is to ensure that the conservation values of marine environments are maintained and protected. It would be more appropriate for objectives, actions and indicators related to protecting marine biodiversity and establishing marine reserves to be allocated to the section on sustainable coastal and marine environments.

SUSTAINABILITY AND SETTLEMENTS

Maintenance of urban bushlands

Section 6 addresses the objective *Sustainability and Settlements*. This section recognises the importance of maintaining natural areas in urban centres to ensure a 'sense of place' in the community. While the draft Strategy is committed to the implementation of Bush Forever (strategy 4.5), there is no recognition within the Strategy of the important role that regional parks play in urban areas. Regional parks are areas of regional open space that are identified as having conservation, landscape and recreation values, and are valued strongly by the community for these reasons. The Perth metropolitan area currently has eight regional parks, where this Department coordinates the management. The State Sustainability Strategy should acknowledge the importance of these natural areas, and commit to extending existing, or creating new, regional parks in urban areas of the State.

SUSTAINABILITY AND COMMUNITY

A critical component of achieving biodiversity conservation for this Department is an active program of community involvement. This Department seeks input from the community as part of its management planning process for its parks and reserves around the State, which has proven to be highly beneficial for both the Department and the community. Therefore, the Department strongly supports and encourages the emphasis in the draft State Sustainability Strategy on community involvement and generating community benefits from the management of the environment that integrates ecological values with social values.

Education and Community Awareness for Sustainability

An important function of the Department is to improve community knowledge of biodiversity conservation issues through communication and advocacy programs. While the draft Strategy identifies community education sources for sustainability from the Department of Education and schools, it does not identify some important, relevant and highly successful education programs administered by this Department, which include the following:

- the Departmental Bushranger and work experience program, which increases the opportunity for young people to learn about and gain hands-on experience with conservation issues in Western Australia;
- the provision of quality information and interpretation programs, which creates opportunities for improving community awareness and appreciation;
- the Departmental volunteer program, which engages people from all backgrounds in the resolution, appreciation and understanding of biodiversity issues;

- the Eco-education program in the Department, which reaches tens of thousands of school children each year, and providing them with the opportunity to take part in the Department's activities; and
- Landscape and NatureBase, which provide practical information to the community regarding conservation, sustainability, responsible recreation and biodiversity matters.

This Department is keen to expand and develop upon the existing community education opportunities it provides. The Sustainability Strategy, in meeting its objectives to conserve biodiversity and promote community education, should identify these important Departmental programs, and provide a means under the Strategy for further development.

CONCLUSION

The State Sustainability Strategy will be a tool for adopting a State-wide approach across all sectors (Government, industry and community) to achieve simultaneous environmental, social and economic improvements in Western Australia, for current and future generations. If implemented successfully, the Strategy will assist in facilitating the achievement of this Department's Mission, for the benefit of the people and environment of Western Australia. This Department fully supports the adoption and implementation of a State Sustainability Strategy, and whilst the Strategy presents considerable challenges for nature conservation in Western Australia, this Department believes it can make a significant contribution to the implementation of the Strategy, and it looks forward to the challenges ahead.

***Department of Conservation and Land Management
March 2003***

Attachment

Edits for **Section 5: Sustainable use of natural resources: Sustainable forests and plantations** (pages 108 – 110) of the consultation draft of *Focus on the future – The West Australian State Sustainability Strategy*. Edits are current at 13 March, 2003.

➤ SUSTAINABLE FORESTRY AND PLANTATIONS

The Western Australian Government has moved to end logging in old growth forests on public land and is proceeding to incorporate these areas into secure conservation reserves, including 30 new National Parks. As part of this process the government has put in place programs to restructure the timber industries to maintain social capital and regional development opportunities. This \$136 million package is an essential part of how sustainability applies to forests.

Western Australia's State forests and timber reserves are vested with the Conservation Commission of Western Australia and managed according to an approved forest management plan. A Draft Forest Management Plan was released for public comment in August 2002 as part of the development of the new plan to implement the Government's forest policy. 916 individual submissions and 25 pro formas, with a combined total of 4,619 submissions, were received. The government is committed to maintaining the ecological integrity of forests and woodlands, and will achieve this through the application of ecologically sustainable forest management principles.

The Draft Forest Management Plan proposes refinements to the way in which levels of timber harvest from native forests are calculated, to provide more accurately for risks and impacting processes that can affect future yields. A second proposal is to formalise adaptive management; a systematic approach to defining management actions, implementing them, monitoring their impacts and then adapting the management practice based on the results of the study. Further research and monitoring to improve the knowledge base underpinning on-going management decisions will be required. The proposals are consistent with the precautionary principle.

Potentially the greatest single threat to biodiversity values in the South West, *Phytophthora cinnamomi*, sometimes referred to as jarrah dieback, is estimated to impact around 2,000 species of native plants and to cause major, permanent and irreversible changes to vegetation structure and habitat values for native animal species. Other species of *Phytophthora*, species of *Armillaria*, and a range of insect pests also cause significant damage.

Phytophthora species continue to pose a significant risk to the sustainability of forests in Western Australia. Disease management needs a strong commitment, such as rigorous controls on movement of vehicles and other vectors into likely uninfected areas, including those in State Forest and Timber Reserves, National Parks and Nature Reserves in the South West. A commitment to rehabilitation of areas degraded by *Phytophthora* is also required.

The forest plantation industry has an important role to play in the future sustainability of the State. Plantations have the potential to produce timber to substitute for the declining production from native forest. In addition, plantations can help deal with salinity and other land degradation issues and, if

placed correctly with appropriate species can help restore biodiversity values, especially through linking existing conservation reserves and other remnant vegetation.

The Forest Products Commission has developed a Plantation Strategy for the South West which includes oil mallees, hardwoods, maritime pines and blue gums. The Small Tree Farm at Balingup has also been working to encourage productive revegetation of cleared farming land. They have developed a hybrid line of eucalypts that are suitable for sawlog production, referred to as 'fat eucalypts'.

The sandalwood industry has considerable potential to contribute to diversification in the rangelands. The opportunities that the sandalwood industry provides for diversification should be reviewed. Such a review would oversee the development of an integrated business and resource management plan that ensures the resource is managed on an ecologically sustainable basis, that maximises environmental, social, regional development benefits as well as providing adequate financial returns to the state. The review should also examine and report on mechanisms to support further development of sandalwood plantations in the agricultural region. The Forest Products Commission has commenced trials with pastoral leaseholders to reduce and where possible eliminate feral goats from sandalwood production areas.

As for other sustainability issues, there will be an ongoing need to continue to involve the community in the planning and decision-making in relation to forest management.

Vision

Western Australia's native hardwood forests are managed on an ecologically sustainable basis that includes a wide range of uses, all of which reflect the unique values of these forests. Regeneration of native forests is also a major focus, with strong community involvement. Production of sawlogs, pulpwood and other timber products from sustainably managed plantations is integrated with native forest use. Rural communities have adjusted to support the changed focus in use and management of native forests and the on-going development of plantations throughout the South West, including their uses in restoring degraded landscapes. Woodlands and sandalwood resources are also used and managed sustainably, with sandalwood production providing the basis for a new industry in the rangelands.

Objective

- Ensure that Western Australia's forests, woodlands and sandalwood resources are managed according to sustainability principles.

Actions underway include

- The Conservation Commission is preparing a new forest management plan incorporating ecologically sustainable forest management principles.
- The government has ended logging in the remaining old-growth forests on State-owned land and is working towards the creation of 30 additional national parks and two new conservation parks to expand the conservation reserve system in the forested South West.
- The Forest Products Commission has developed a Plantation Strategy for the South West.
- An agreement to develop a LVL plant from the Gnangara pine plantation

creating over 100 jobs and improved ground water management possibilities.

Proposed actions

3.17 Continue to support restructuring of the timber industry, giving particular support to value-adding opportunities in the timber processing and wood working areas.

3.18 Promote the efficient use of all logs, development of high value-added timber utilisation, and harvesting rotations based on maintaining the full range of forest values including saw log production.

3.19 Actively support the Action Plan for Tree Farming in Western Australia for the further development of a plantation industry on previously cleared agricultural land within the guidelines being developed by the Western Australian Planning Commission to retain viable rural communities. Particular attention should be given to production of sawlogs as a substitute for the declining yield from native forests.

3.20 Continue to consult with communities over the final boundaries on the 30 new forest national parks.

3.21 Review the sandalwood industry in Western Australia, the present and projected resource availability, the manner and pattern of exploitation of the resource, and the role that it might play in regional development and ecologically sustainable management of the rangelands. Develop a sandalwood management plan that is consistent with principles of Ecologically Sustainable Forest Management.

3.22 Seek to minimise the loss of natural values from State Forests and Timber Reserves and all other reserve categories within the South West as a consequence of the extraction of low value bulk commodities such as sand and gravel.

3.23 Create a comprehensive Dieback Strategy including how to:

- Establish and maintain a comprehensive database on the distribution of *Phytophthora* species throughout the South West, and use this to ensure that future timber harvesting operations and other activities do not lead to the spread of these pathogens.
- Develop and implement rehabilitation plans for selected disease affected areas.
- Ensure the Western Australian nursery industry follows best practice hygiene procedures to eliminate *Phytophthora* species from all seedlings and propagating material.
- Work with relevant Commonwealth agencies to prevent the introduction of new plant diseases into Australia that could impact on the forests and forestry industry.
- Develop an education program for the general public, and private and public organisations whose activities involve use of land in dieback susceptible areas.
- Support the establishment of a Centre of Excellence for *Phytophthora* research into ecological impacts on key elements of the biota, methods of managing and counteracting impacts of diseases, and monitoring spread.

3.24 Continue to develop skills in production and marketing of fine timber products made from specialty native hardwoods.

3.25 Support accreditation of forestry and plantations as an important part of maintaining sustainable forest management in Western Australia.

Indicators and targets

All Western Australian public forests are subject to Forest Management Plans that are approved by the Minister for the Environment on the advice of the Environmental Protection Authority.

Global opportunities

The decision to stop the logging of old growth forests in the South West of Western Australia and a move towards sustainable forest management has attracted interest from around the world. When fully implemented, monitored and evaluated, this area of sustainability will be of considerable global value as the world's forests continue to decline at an alarming rate.

Further information

Forest Products Commission
<http://www.fpc.wa.gov.au>

Conservation Commission of Western Australia
<http://www.conservation.wa.gov.au>

Department of Conservation and Land Management
<http://www.naturebase.net>