

## Ongoing management of the Gngangara-Moore River State Forest (State Forest 65)

### TO:

Honourable Simone McGurk MLA, Minister for Water

by email: Minister.McGurk@dpc.wa.gov.au

Honourable Reece Whitby, Minister for Environment

by email: Minister.Whitby@dpc.wa.gov.au

Honourable Jackie Jarvis, Minister for Forestry

by email: Minister.Jarvis@dpc.wa.gov.au

18 July 2024

Dear Ministers

We are writing to you regarding the ongoing management of the Gngangara-Moore River State Forest (State Forest 65) (Figure 1), and to request that the State Government take five actions to protect and enhance the environmental, community and cultural values that the Gngangara-Moore River State Forest supports.

We are writing you jointly because the Department of Biodiversity, Conservation and Attractions (DBCA), the Department of Water and Environmental Regulation (DWER), and Forest Products Commission (FPC) will need to work together to implement these actions, and you are the Ministers responsible for those agencies and for the overall administration of the *Conservation and Land Management Act 1984*, the *Rights in Water and Irrigation Act 1914*, the *Forest Products Act 2000*, and the *Gngangara Groundwater Allocation Plan*.

### **EXECUTIVE SUMMARY**

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We are a group of community-based organisations and community members with a long-standing interest in the Gngangara-Moore River State Forest (State 65).

We are concerned that, without appropriate ongoing management and adequate funding for land management operations, the environmental, community and cultural values of this unique landscape will deteriorate, including the value of pine plantations and Banksia woodlands as critical feeding habitat for Carnaby's Cockatoos.

We understand the State Government's focus on maximising recharge to the Gngangara groundwater system, and propose the following additional objectives to guide management of the Gngangara-Moore River State Forest and the surrounding conservation estate:

**OBJECTIVE 1: Manage pine plantations as feeding habitat for Carnaby’s Cockatoos**, through thinning operations to optimise cone production and low-intensity prescribed burning to reduce the fuel load and protect the plantations from high-intensity fire.

**OBJECTIVE 2: Manage ex-plantation land to provide food and other habitat resources for Carnaby’s Cockatoos and other native fauna**, through retention of pine wildings, preparation of fallow land for revegetation, and planting of native species.

**OBJECTIVE 3: Manage native vegetation within the Gnangara-Moore River State Forest and the surrounding conservation estate to achieve a net gain in native vegetation and landscape-scale conservation and restoration**, through weed and dieback management, feral animal control, creation of ecological corridors, linkages and buffers, closure of roads and tracks, revegetation of disturbed or degraded areas, and other activities.

To support these objectives, we request that these management actions be implemented.

**ACTION 1: Implement an inter-agency agreement for the ongoing management of the Gnangara-Moore River State Forest**

**ACTION 2: Prepare, approve and implement a management plan for the Gnangara-Moore River State Forest under the *Conservation and Land Management Act 1984***

**ACTION 3: Allocate State Government funding to manage pine plantations as food resources for Carnaby’s Cockatoos and to revegetate ex-plantation land with native species**

**ACTION 4: Update Ministerial Statement 819 (fulfill s 46 request to the EPA in 2022)**

**ACTION 5: Establish a community reference group for Gnangara-Moore River State Forest**

## **BACKGROUND – GNANGARA-MOORE RIVER STATE FOREST & SURROUNDS**

The Gnangara-Moore River State Forest comprises 66 100 ha of native forest and woodland, and plantation and ex-plantation land within the northern Swan Coastal Plain.

The lands and waters in the Gnangara-Moore River State Forest and adjacent reserves (eg Yeal Nature Reserve, Yanchep National Park, Wilbinga Conservation Park) form the largest contiguous conservation estate in the Perth-Peel region.

As such, appropriate ongoing management (‘system stewardship’) of the Gnangara-Moore River State Forest and surrounds can make a significant contribution to Outcome 1 of the State’s *Native Vegetation Policy –Enable all sectors to contribute to a net gain and landscape-scale conservation and restoration* – as well as supporting groundwater recharge and other objectives.

In the 1900s, the State Government cleared about 23 000 ha within the Gngangara-Moore River State Forest to establish the Gngangara, Pinjar and Yanchep pine plantations, of which about 4700 ha remains as pine plantation (comprising c. 2600 ha of mature pine and c. 2100 ha of pine planted within the last 10 years) and about 20 000 ha is now ex-plantation (or ‘fallow’) land.

Several State Government agencies have statutory responsibilities relating to land, water, and forest products within the Gngangara-Moore River State Forest, including DBCA, DWER and FPC. The *Gngangara Groundwater Allocation Plan*, read with the *Gngangara Groundwater Allocation Plan Methods Report*, sets out a framework for post-harvest land use in the Gngangara, Pinjar and Yanchep pine plantations.<sup>1</sup>

The proposed change of land use, purpose and condition in the Gngangara, Pinjar and Yanchep pine plantations was referred to the EPA in June 2022 on the basis that the changes constituted a ‘proposal’ for the purposes of Part IV of the *Environmental Protection Act 1986*.<sup>2</sup> In December 2023, the proponents of the proposal (FPC and DBCA) gave notice to the EPA that after the *Forest Management Plan 2014-2023* ceased to operate, the proponents would not proceed with the proposal being assessed by the EPA, and specifically would not proceed with the progressive harvesting of the remaining pine in the Gngangara-Moore River State Forest by undertaking clearfelling or ‘post-harvesting land management’ in respect of the land with that remaining pine, and that any felling of the remaining pine would be on a selected basis for the purpose of maximising pinecone production or for the salvage of any pine that was damaged through bushfire.

In December 2023, the State Government announced that it had decided, as part of the *Forest Management Plan 2024-2033*, to cease harvesting of pine in the Gngangara-Moore River State Forest.<sup>3</sup> Relevantly, the *Forest Management Plan 2024-2033* states:

**Rehabilitation following cessation of plantation activities**

Within State forests there are areas where plantations have been felled and left fallow pending opportunities to re-establish native vegetation. The Gngangara-Moore River State Forest includes 17,500 ha of ex-plantation area. Consistent with the Gngangara groundwater allocation plan (DWER 2022a) opportunities are being pursued to replant these areas to native vegetation, to provide environmental and social benefits, including food resources for ngoolyak, while ensuring ongoing management is balanced with the primary objective of maximising groundwater recharge.

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<sup>1</sup> <https://www.wa.gov.au/service/natural-resources/water-resources/gngangara-groundwater-allocation-plan>

<sup>2</sup> <https://www.epa.wa.gov.au/proposals/change-land-use-purpose-and-condition-land-within-gngangara-pinjar-and-yanchep-pine>

<sup>3</sup> <https://www.wa.gov.au/government/media-statements/Cook-Labor-Government/Cockatoo-habitat-preserved-following-Gngangara-pines-decision-20231213>

The *Forest Management Plan 2024-2033* specifies that indigenous State forest is reserved for a combination of the following purposes: (a) conservation; (b) recreation; (c) water catchment protection; and (d) other purposes being the purposes prescribed in regulation 81<sup>4</sup> of the *Conservation and Land Management Regulations 2002*.

The State Government is also proposing to support carbon farming operations by non-government entities within the Gnangara-Moore River State Forest.<sup>5</sup>

The State Government has defined ‘carbon farming’ to refer to ‘land management activities aimed at storing carbon in trees and soils or avoiding the release of carbon through improved fire management activities’, and has stated that examples of carbon farming activities ‘could include (but are not limited to)’ revegetation, removal of feral herbivores, and/or proactive fire management.<sup>6</sup> In this way, carbon farming may include land management activities that manage existing remnant vegetation or which involve revegetation of areas where native vegetation has been cleared.

## **KEY OBJECTIVES FOR THE GNANGARA-MOORE RIVER STATE FOREST**

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We support the work of DBCA to plant native plants in ex-plantation areas. It is our understanding that DBCA has planted up to 20,000 seedlings each year since 2018, at sites ranging from 25-40 ha. It is also our understanding that DBCA has carried out revegetation in ex-plantation areas since the late 1990s, at varying densities.

This work is valuable – but, to date, only a limited area has been revegetated. Revegetation with native species must occur as quickly as possible, to minimise the gap in availability of

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<sup>4</sup> Regulation 81 of the *Conservation and Land Management Regulations 2002* provides that:

For the purposes of section 55(1a) of the Act, the other purposes for which an indigenous State forest or timber reserve may be reserved include any of the following —

- (a) the taking of water from the land;
- (b) the storage of water on the reserve;
- (c) the removal of water from the reserve;
- (d) the location of infrastructure, and other similar facilities, that serve the public interest, on the reserve, to the extent to which locating such infrastructure and facilities is not inconsistent with achieving the other purposes for which the land is reserved;
- (e) the removal of salvaged forest products from the reserve, if the opportunity for the salvage arises —
  - (i) from an activity carried out for a conservation purpose; or
  - (ii) from, or in anticipation of, clearing for mining operations or for the purpose described in paragraph (d).

<sup>5</sup> <https://www.wa.gov.au/government/media-statements/Cook-Labor-Government/Carbon-farming-proposal-to-improve-conservation-progresses-20231103>

<sup>6</sup> See the *Carbon for Conservation Opportunity Statement* (Ver 1 - 17 Aug, 2020).

food resources for Carnaby’s Cockatoos due to the harvesting of pine without replanting in the Gngangara-Moore River State Forest.

We also note that revegetation of ex-plantation areas has succeeded when landscaping works have been undertaken immediately after harvesting (e.g. to remove stumps, to minimise weed intrusion). Now that harvesting has ceased, revegetation will be more costly and difficult (e.g. because stumps are hidden). Thus, while we note the recent carbon farming proposal to revegetate up to 5700 ha of DBCA-managed land in the Gngangara-Moore River State Forest and Karda Block to the east of Jurien<sup>7</sup>, we are concerned about the timeframe over which the revegetation will occur and the commitment of the proponent to revegetate within Gngangara-Moore River State Forest, if revegetation there proves more costly than at alternative sites.

## **KEY OBJECTIVES FOR THE GNANGARA-MOORE RIVER STATE FOREST**

We are concerned that, without appropriate ongoing management and adequate funding for land management activities, the environmental, community and cultural values of Gngangara-Moore River State Forest will deteriorate, including the value of pine plantations and Banksia woodlands as critical feeding habitat for Carnaby’s Cockatoos.

We therefore propose the specific objectives in Table 1 for inclusion in ongoing management:

**Table 1. Objectives to include in ongoing management for the Gngangara-Moore River State Forest & the surrounding conservation estate**

1. **Manage pine plantations as feeding habitat for Carnaby’s Cockatoos**, through thinning operations to optimise cone production and low-intensity prescribed burning to reduce the fuel load and protect the plantations from high-intensity fire.
2. **Manage ex-plantation land to provide food resources for Carnaby’s Cockatoos and other native fauna**, through retention of pine wildings, preparation of fallow land for revegetation, and planting of native species.
3. **Manage native vegetation within the Gngangara-Moore River State Forest and the surrounding conservation estate to achieve a net gain in native vegetation and landscape-scale conservation and restoration**, through weed and dieback management, feral animal control, creation of ecological corridors, linkages and buffers, closure of roads and tracks, revegetation of disturbed or degraded areas, and other activities.

## **REQUESTED ACTIONS**

To support these and other objectives, we request that the following management actions be undertaken.

1. **Implement an inter-agency agreement for management of the Gngangara-Moore River State Forest**

<sup>7</sup> <https://www.wa.gov.au/government/media-statements/Cook-Labor-Government/Carbon-farming-proposal-to-improve-conservation-progresses-20231103>

Specifically, we request that DBCA, DWER and FPC – as the principal State government entities with statutory responsibilities for land, water, and forest products within the Gngangara-Moore River State Forest – enter an agreement regarding the on-going management of the land and forest products within the Gngangara-Moore River State Forest.

This agreement should include agreed outcomes, actions and financial and operational contributions to land management within the State Forest, to be aligned with the implementation of the Gngangara groundwater allocation plan.

## **2. Prepare, approve and implement a management plan for the Gngangara-Moore River State Forest under the *Conservation and Land Management Act 1984***

Allied to the inter-agency agreement, we request that a management plan for the Gngangara-Moore River State Forest be prepared and approved, pursuant to Part V of the *Conservation and Land Management Act 1984* (CALM Act).

Section 55(1) of the CALM Act provides the management plan should contain (a) a statement of the policies or guidelines proposed to be followed and (b) a summary of the operations proposed to be undertaken, in respect of Gngangara-Moore River State Forest during a specified period, which shall not exceed 10 years.

We note that the necessary involvement of the Conservation and Parks Commission in this process.

The management plan should indicate the specific operations to be undertaken to manage pine plantations, fallow land, and native vegetation, including:

- pine plantations: thinning and low-intensity prescribed burning;
- fallow land: preparation of land for revegetation, planting of native species; and
- native vegetation: management of weeds and feral animals, ecological restoration

## **3. Allocate State Government funding to manage pine plantations as food resources for Carnaby's Cockatoos and to revegetate ex-plantation land with native species**

We request that funding be allocated, on an ongoing basis, for DBCA to manage pine plantations within the Gngangara-Moore River State Forest as food resources for Carnaby's Cockatoos (including thinning to optimise cone production and low-intensity prescribed burning), and for DBCA to plant native vegetation in ex-plantation areas and to prepare fallow land for revegetation.

## **4. Update Ministerial Statement 819**

We request that Ministerial Statement 819 (*Gngangara Mound Groundwater Resources [Including Groundwater Resource Allocation, East Gngangara, City of Swan]*) be updated to

amend the implementation conditions and to revise the Proponent's Environmental Management Commitments. It is our understanding that a request for an inquiry under section 46 of the *Environmental Protection Act 1986* was made to the EPA in February 2022: <https://www.epa.wa.gov.au/proposals/gnangara-mound-groundwater-resources-including-groundwater-resource-allocation-east>

**5. Establish a community reference group for the Gnangara-Moore River State Forest**

We request that the management plan for the Gnangara-Moore River State Forest include provision for a community reference group.

Thank you for considering our request. We are happy to meet with you to discuss the request, and please feel free to raise any questions. Dr Hugh Finn will act as our contact person.

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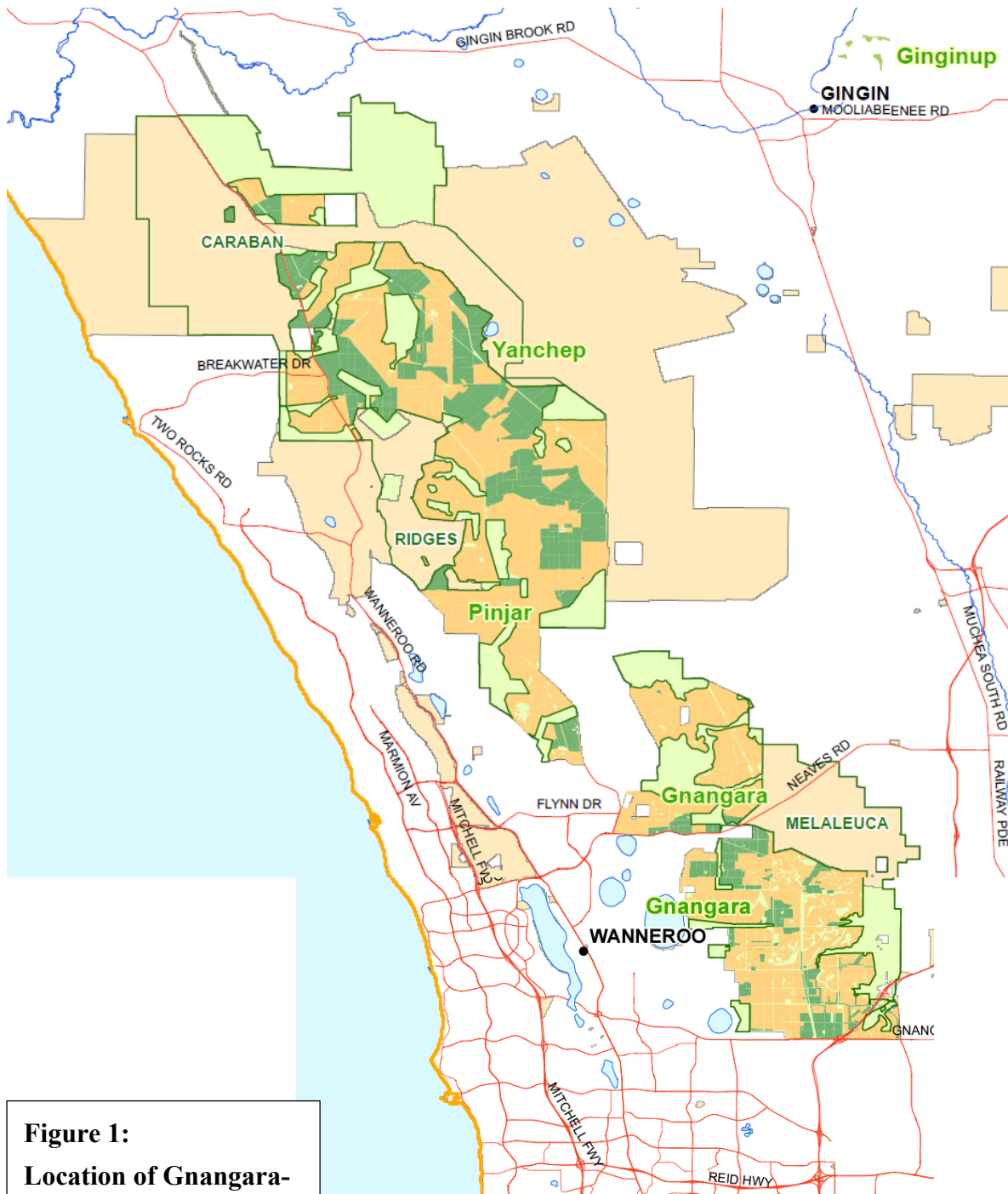
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**Figure 1:**  
**Location of Gnamoore River State Forest (State Forest 65)**

Source: DFA map1 Midwest Gnamoore River November 2022 and DFA map2 Harvey Collie November 2022

available at:

<https://www.wa.gov.au/government/publications/defined-forest-area-dfa-maps>

**Map Legend**

- State forest and timber reserves
- Conservation reserves\*
- FPC owned property
- State pine plantation
- Pine sharefarm
- Fallow land in the Gnamoore, Pinjar and Yanchep plantations
- Forest Management Plan 2014 - 2023 boundary
- Forest block boundary

\* Land categories as proposed in the Forest Management Plan 2014 - 2023