



16 December 2022

Professor Chris Doepel PSM
Chairman
Conservation Commission of Western Australia
17 Dick Perry Avenue
Kensington WA 6151

Dear Professor Doepel

RE: Draft Forest Management Plan 2024-2033

Thank you for the opportunity to provide input into the Draft Forest Management Plan 2024-2033 ('the Draft FMP').

The Bibbulmun Track (the Track) is WA's premier long-distance walking trail, stretching 1000kms from Kalamunda to Albany, through the South West and Warren Regions, including all of the major forest types to be managed under the draft Forest Management Plan 2024-2033.

It represents the lowest impact opportunity for Western Australian and visitors to interact with, and appreciate, the unique forest ecosystems of the south west.

Retaining the integrity of the Bibbulmun Track as a continuous long-distance trail and a quality 'wilderness' experience can contribute to the understanding of, and support for, the State Government's Forest management activities.

Importantly, as noted in the current *Forest Management Plan, 2014-2023*, recreation and tourism assets such as the Bibbulmun Track are recognised as world-class facilities that provide an important basis for some south-west tourism and recreation businesses¹.

We trust that you will accept our comments on opportunities to improve the Forest Management Plan so that the Track can continue to inspire protection of the biodiversity and ecosystems of south west Western Australia.

Your sincerely

Kath Broderick
Chair, Bibbulmun Track Foundation

¹ Conservation Commission of Western Australia, Forest Management Plan 2014-2023, 2014, https://www.dpaw.wa.gov.au/images/documents/conservation-management/forests/FMP/20130282_WEB_FOREST_MGT_PLAN_WEB.pdf page 118.

Bibbulmun Track Foundation submission: Draft Forest Management Plan 2024-2033

Bibbulmun Track intersections with the Draft FMP

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Foundation 1: The Bibbulmun Track and Noongar cultural heritage

When a name was being sought for a proposed long-distance track in the southwest, many options were considered. Kirup forester Len Talbot in 1978 proposed that the Track be named Bibbulmun, in recognition of one of the many Noongar social and language groups of the southwest. The iconic Bibbulmun Track trail marker, a stylized representation of the Waugal (Rainbow Serpent), was suggested by Noongar elder Nundjan Djiridjarkan, Ken Colbung.

Several of the Bibbulmun Track campsites have Aboriginal names (Waaalegh, Yourdamung, Yabberup, and Noggerup) and the Foundation has developed interpretation materials about the Noongar seasons, food and spirituality as well as the Noongar country areas that the track passes through (Wajuk, Barladong, Wiilman, Pinjarup, Bibbulman and Minang).

The Bibbulmun Track Foundation is continuing to evolve its understanding of, and engagement with Noongar Culture and supports the first strategic goal of the FMP.

Foundation 2 and 3: Biodiversity conservation and Forest health and climate resilience

Maintaining and expanding the conservation reserve system

The Northern Jarrah Forests

Although WA is a big place, the area of it particularly suited to bush walking is not vast when you take account of WA's population centres. The bulk of WA's population live on the coastal plain between Perth and Bunbury. For most of them the Darling Range is the closest large area most suited to bush walking.

In the late 1980's the Track was realigned between Kalamunda and Dwellingup to avoid conflict with bauxite mining. In the 90's the Track was again being impacted by mining, forestry operations, and water catchment issues.

At this time, a major overhaul of the route occurred with only 10% of the original Track retained. The 'new' Bibbulmun Track was largely purpose built and aligned through national parks and reserves to take in the most scenic routes to provide people with a chance to immerse themselves in the natural environment.

Since the opening of the 'new' Bibbulmun Track in 1998 the rate of clearing in the Northern Jarrah Forest has accelerated with more than 11,000 ha cleared in the past decade alone. Rather than an immersive experience in nature, walkers in this region are often accompanied by the sounds of mining, and many of the expansive views are now marred by large scars on the landscape.

The rate of replanting and restoration of these areas does not appear to be keeping pace with the clearing of more forest. The success of the rehabilitation is also questionable and the cumulative impacts of logging, clearing and climate change on the forests have been profound over the decades.

Notably, while 88% of Southern forests are currently protected, only 23% of the Northern Jarrah Forests are in the conservation estate².

The Draft FMP does not adequately link the national park areas (existing and previously proposed) within the Northern Jarrah Forest region, instead creating small areas of remnant, quality forest habitat, which will be surrounded by degraded forest and landscape as a consequence of the current and future mining activities.

The FMP should draw on the recently published, *Defining and Creating New Protected Areas in the South West Forests Beyond 2024*³ mapping undertaken by the Beeliar Group, which defines additional areas that require protection to achieve such a network.

Proposed amendments to the Draft FMP

- Create a connected network of National Parks and Nature Reserves in the Northern Jarrah Forests to protect vulnerable forest ecosystems from the escalating threat of climate change and bauxite, gold, lithium and other mining, as well as major infrastructure projects.

Forest health and climate resilience and managing permitted disturbance activities

As noted on page 44 of the Draft FMP, "Existing and substantial mining operations for bauxite, coal, gold, mineral sands, lithium and other minerals occur throughout the planning area". Current mining operations, "could increase in the future with expansion of existing operations, and if new mineral or petroleum deposits are identified and additional resource development proposals are approved".

The Bibbulmun Track passes through forest areas impacted by bauxite and gold mining (on the Darling Scarp) and lime mining (on the Nullaki Peninsula near Denmark).

The physical, noise and visual amenity impacts of mining and other industrial activities in several areas along the Track diminishes the amenity, including the peace and tranquility, significantly, to the detriment of walker experience and the reputation of the Track.

Examples include:

- A. the visual impacts of ALCOA from the Track between Mt Cuthbert to Mt Cooke.
- B. the noise impact of blasting by ALCOA from Monadnocks campsite through to Mt Wells Campsite (impacting 6 campsites).
- C. the visual impact of the Boddington Gold mine from the Track between Boonnering Hill (near Albany Hwy) and Mt Wells.
- D. the visual impact of landfill operations near North Bannister from White Horse Hills.
- E. the noise impacts of blasting at the Boddington Gold mine from White Horse Hills Campsite to Chadoora Campsite.
- F. the noise impact of the Worsley conveyor belt between Dookanelly Campsite south of Dwellingup and Harris Dam Campsite just north of Collie (impacting four campsites).
- G. minor visual and noise impacts from the Greenbushes Lithium mine on the Track at and near Blackwood Campsite south of Balingup
- H. the visual and noise impact of lime mining operations on the Nullaki Peninsula between the Nullaki Wilderness Gate and beyond the Nullaki Campsite.
- I. the visual impacts due to deforestation of native forest as a result of the Millstream Dam expansion south of Balingup.

² Daniel Jan Martin The Beeliar Group The Leeuwin Group, *Defining and Creating New Protected Areas in the South West Forests Beyond 2024*, October 2022, page 6 https://thebeeliargroup.files.wordpress.com/2022/10/221006_beyond-2024_djm-tbg-tlg_web.pdf

³ *Ibid*

Conversely, if retained intact, the Bibbulmun Track and its corridor is also a wildlife corridor, enabling flora and fauna to relocate in response to disruptive mining and forestry activities, as well as to climate change.

It is important to recognise that the values and opportunities afforded by the Bibbulmun Track are not only influenced by direct impacts to the Track, but also activities in the surrounding areas.

Proposed amendments to the Draft FMP

The current and draft FMP's define Travel Route Zones as "A Corridor that extends at least 200 metres from each side of the Bibbulmun Track".

The Travel Route Zones should be expanded to:

- expand the corridor on each side of the Bibbulmun Track and Munda Bididi Trail to at least 500 metres and at least 500 metres from any mining, forestry or other industrial operations (to avoid narrow trail corridors between two mines).
- preclude the intersection of the Bibbulmun Track and Munda Bididi trails and associated corridors by mining, forestry or other industrial operations, so as to retain their role as wildlife corridors.

Fire management and thinning

The Bibbulmun Track Foundation appreciates the importance of effective fire management and welcomes the Department of Biodiversity, Conservation and Attractions (DBCA)'s commitment to working with traditional owners through management partnerships in helping to share (two-way learning), maintain, connect and where possible rebuild Aboriginal people's connection to country, including gaining knowledge of cultural fire practices (p. 73).

The Foundation works closely with the DBCA to notify walkers about prescribed burns and to educate walkers about bushfire safety.

The impact of prescribed burns and forest thinning in the areas surrounding campsites and the Track can have significant and long-lasting impacts on the visual amenity and habitat of these areas.

Proposed amendments to the Draft FMP

- To the extent feasible protect Travel Route Zones from prescribed burns and exclude them from thinning activities.

Soil and water

The Bibbulmun Track passes through several Disease Risk Areas (DRAs), where the use of vehicles without written permission is illegal because they spread the destructive dieback root disease by transporting spores from the soil.

The Foundation is very aware of its responsibilities in relation to dieback management and educates potential walkers and BTF volunteers through its website and publications about appropriate access points and permits.

Unfortunately, there has been a considerable increase in the inappropriate use of the Track and access of campsites by non-walkers in vehicles including trail bikes. Not only does this create additional risk from the spread of *Phytophthora* dieback, but impacts the experience of walkers who have often walked several days to these areas that are otherwise inaccessible.

Proposed amendments to the Draft FMP

- Increase surveillance and impose additional non-compliance penalties for trail bikes and other vehicles driving on the Track and/or accessing Bibbulmun Track campsites, particularly those in water catchment and Disease Risk Areas.

Recreation and tourism: the importance of trails

The Track attracts thousands of Western Australians and visitors to the State's south west every year with a 2015 survey showing that over 300,000 days are spent on the Track each year, generating around \$13 million in economic benefit. Much of this expenditure occurs in regional areas, particularly on food and accommodation, creating local job opportunities.

In addition to individuals, families and tourists, the Track is used by schools and youth groups for outdoor recreation. Use of the Track, and hiking in general, has increased exponentially since then with the physical and mental health benefits of spending time in nature widely accepted.

Proposed amendment to the Draft FMP

The Bibbulmun Track and Munda Biddi Trails should be mentioned separately to the other tourist attractions listed in section 3.6.2, both due to their greater economic contribution, and the fact that they pass through all of the areas and forest types that are subject to the draft FMP. For example:

There is a range of nature-based tourism offerings available in the planning area which provide social, educational and economic benefits including bushwalking, running, cycling, camping, swimming, fishing, canoeing, four-wheel driving, trail bike riding and caving. There are a number of important tourist attractions in the south-west including the Valley of the Giants and Tree Top Walk, and Calgardup, Giants and Mammoth Caves. Many national parks in the region also provide for outdoor recreation and naturebased tourism such as Wellington, Beelu, Warren, Leeuwin-Naturaliste, Walpole-Nornalup, Gloucester and Greater Beedelup.

*A growing number of regional towns and locations are an important element of various trail networks. **Of particular note are the 1000km Bibbulmun Track and Munda Biddi Trail, both of which extend from Perth to Albany through each of the major forest types covered by this FMP.***

Conclusion

The iconic 1000km Bibbulmun Track passes through all of the major forest types to be managed under the draft Forest Management Plan 2014-2023.

It represents the lowest impact opportunity for Western Australian and visitors to interact with and appreciate the unique forest ecosystems of the south west.

Retaining the integrity of the Bibbulmun Track as a continuous long-distance trail and a quality 'wilderness' experience can contribute to the understanding of and support for the State Government's Forest management activities.

The FMP should protect the integrity of the Bibbulmun Track from both direct and indirect impacts, recognising that the managed interaction with the south west forests that the Track will contribute to a greater understanding and delivery of the objectives of the FMP.