



20 January 2009

Hon. Donna Faragher MLC
Minister for Environment
10th Floor, Dumas House
2 Havelock Street
WEST PERTH WA 6285

Dear Minister

CHESTER FOREST: DIEBACK MANAGEMENT AND PROTECTION OF THE SCOTT RIVER IRONSTONE THREATENED ECOLOGICAL COMMUNITY

In 2008 Leeuwin Environment corresponded with the environment Minister of the previous Government about Chester forest (located north-east of Augusta) in an attempt to have it withdrawn from logging plans, but with no success. We pointed out Chester's high conservation value and lack of resource, and raised concerns about lack of compliance with the Forest Management Plan a freedom of information application had revealed. This letter sets out additional concerns with respect to dieback management and threatened ecological community (TEC) protection at Chester.

As you will probably know, a campaign is underway by community members to try to stop the logging there. Chester's exceptional conservation value is well documented and obvious to anyone who visits the area, as is the harm done by logging since the forest to the north has been extensively logged and burnt. Dieback and TEC issues are just two of a list of reasons why Chester and other healthy forest in the vicinity should be conserved, which includes conserving the wetter southern forests as an effective response to the impacts of climate change.

Lack of a Dieback Management Plan

The Forest Management Plan 2004-2013 states, '[The Department and the Forest Products Commission will conduct their operations having regard to the "Management of *Phytophthora* and Disease Caused By It" policy and in accordance with Volume 1 of the "*Phytophthora cinnamomi* and Disease Caused By It Guidelines".](#)' (Page 45, section 18.2)

Volume 1 of the '*Phytophthora cinnamomi* and Disease Caused By It' guidelines, Section 7 – 'Management of Uninfested "Protectable" Areas', 7.2 Management Strategy states '[The Department will:](#)

1. Establish and maintain a set of protocols, founded on science and logic, which guide land managers in identifying and managing "protectable" areas and prioritise the allocation of available resources for protecting them.

2. Implement a long term management system of controlled and hygienic access to “protectable” areas which incorporates the following elements:
 - a) The use of accredited Disease Interpreters to prepare up-to-date maps of, and field demarcate, the distribution of *Phytophthora cinnamomi* through the detection and analysis of the disease symptoms characteristic of root rot disease caused by it in native plants. This is to be supported by the laboratory analysis of soil and tissue samples by the Vegetative Health Service.
 - b) The analysis and identification of ‘protectable’ areas, which are free of the evidence of infestation by *Phytophthora cinnamomi*, and which are amenable to being protected from the establishment of new centers of infestation arising from the activities of man through the control of access into them and the imposition of hygienic management practises on entering them.
 - c) **The documentation, implementation and regulation of plans for the management of ‘protectable’ areas,**
 - d) **The implementation of appropriate monitoring and review programs.** (our emphasis)
3. The preparation and maintain appropriate management guidelines and training programs.’

Section 7.3.6 Guidelines for preparing *Phytophthora cinnamomi* Management Plans for ‘protectable’ areas states:

‘The following steps are used by the District Manager, in consultation with the various activity proponents and accredited Disease Interpreters, when preparing *Phytophthora cinnamomi* Management Plans for a vulnerable area of land vested in the Conservation Commission:

- a) Use a whole of landscape unit approach to analyse the *Phytophthora cinnamomi* Occurrence Map and identify the uninfested ‘protectable’ areas and rationalise their management boundaries;
- b) Identify all bona fida activities current and planned for the ‘protectable’ areas;
- c) For each ‘protectable’ area Managers must determine:
 - i) Long term access control, and
 - ii) The measures to be taken to minimise human vectoring of the pathogen into them during short term activities that are scheduled to take place within them;
- d) **Document (Figure 7.10) the *Phytophthora cinnamomi* Management Plan (using the form “*Phytophthora cinnamomi* Management Plan” - see Appendix 13.1) listing the required management actions and accountabilities for each action.** This will include the preparation of a “*Phytophthora cinnamomi* Management Map” (to be attached to the completed form) that uses the standard legend (see Appendix 13.2); and
- e) Review the results of implementing the plan and periodically audit compliance using the “Environmental Standards Checklist – *Phytophthora cinnamomi* Management Plans” (see Appendix 13.3).’

The coupe Chester 01 has been interpreted for *Phytophthora cinnamomi* 21-3-06 (FOI 23), a Management map has been prepared 17-3-06,(FOI 24) but it appears that a management plan has not been completed, although a large part of the coupe has been identified as ‘protectable’. No ‘*Phytophthora cinnamomi* Management Plan’ was received through our FOI of all relevant documents. According to the FMP, DEC must fully adhere to the above policy in its approval of the logging of Chester 01.

'Protectable Area' not protected and other dieback management plan issues that need to be addressed

Furthermore, although DEC /Forest Products Commission Map BCH0103 (FOI 20) identifies 'in-coupe' roads, **much of the planned roading is outside of the coupe**, through approximately 4Km of uninterpreted bushland, clearly not fulfilling Management Objective 1, *Phytophthora cinnamomi* and disease caused by it to, **'Progressively identify uninfested "protectable" areas and manage human access to them so that the role of humans as vectors in establishing new centres of infestation is reduced to the lowest possible level'**

The document 'FPC109 – Pre Operations Checklist 9-8-06' (FOI22) was approved for 'Phytophthora cinnamomi Management Plan & Map' by the Blackwood District Kirup Office on the 15th March 2007, the only proviso being that the on-ground mapping is brought up to date. **But, as stated above, no management plan has been seen by us (via FOI) and the present roading layout appears poorly planned.**

<http://www.dwg.org.au/go/about-dieback/what-is-dieback/index.cfm> (Dieback Working Group website) states that,

'..... it is human activity that causes the most significant, rapid and widespread distribution of this pathogen. Road construction, earth moving, driving infested vehicles on bush roads and stock movement can all contribute significantly to the spread of *Phytophthora dieback*'

The definition of a Management Plan is... **'*Phytophthora cinnamomi* Management Plan** means the document (includes appended maps) that describes and controls how human access to uninfested "protectable" areas is to be managed so that the role of humans as vectors in establishing new centres of infestation will be reduced to the lowest possible level.' '*Phytophthora cinnamomi* and Disease Caused By It' Volume I – Management Guidelines 2.2 Glossary of common words

Set against those definitions, there are a number of issues around proceeding without a proper plan, as is occurring -

- The road width, and depth of road building material (probably gravel) has not been specified in any of the pre-operational documents.
- It has not been specified where the FPC plans to source its (P.c. free) gravel from for the length of road within the 'protectable' area.
- No specifications given for the 'clean on entry' point, including where any dirty water would be dumped.
- The two 'protectable' areas to the east of the coupe have no landings or roads marked. The road going northwards from Clem Rd is on the edge of 'protectable' and 'infected' areas, and it is crucial that the P.c. mapping here is accurate. However, this western boundary was described by the interpreters as "Here the overlap of swamp vegetation (*Agonis* etc) into the lower slope vegetation obscured expression", clearly unsuitable for an access road.
- The Paget Nature Reserve, containing rare and priority plants and at least one Threatened Ecological Community is severely threatened by the possibility of P.c. spread from this logging proposal. Water from Chester 01 flows directly south into Paget Reserve, then into agricultural land. P.c. spores travel in water. ('Soil that is warm and moist provides the best conditions for *Phytophthora dieback*. These conditions allow the pathogen to produce millions of spores. These spores are attracted to the plant roots by swimming through the soil water.' (DWG website))
- P.c. is not only a threat to bushland, but affects agricultural plants as well, 'including apple, peach, apricot and avocado trees, grapevines, radiate pine, camellias, azaleas, roses, proteas and rhododendrons.' (DWG website)

It is obvious, that without a much more rigorous P.c. risk assessment process none of the management objectives stated in ‘*Phytophthora cinnamomi* and disease caused by it’, Volume I – Management Guidelines, will be achieved, namely –

‘MANAGEMENT OBJECTIVES

1. Progressively identify uninfested ‘protectable’ areas and manage human access to them so that the role of humans as vectors in establishing new centres of infestation is reduced to the lowest possible level,
2. Manage already infested and un‘protectable’ areas in a manner which sustains an appropriate level of environmental and social benefits,
3. Implement, as a component of broader management programs to protect threatened flora, threatened ecological communities and the habitat of threatened fauna, a program for the use of the protective chemical phosphite,
4. Implement programs of interagency research and liaison which are closely linked with:
 - a) management requirements, and
 - b) other Western Australian, interstate, Commonwealth and international institutions involved in research and management on *Phytophthora*.
5. Encourage community interest and participation particularly through support of the Dieback Consultative Council (DCC) and its prospective Regional Coordination Groups.

From a P.c. perspective, rather than logging Chester it would make much more sense to declare the whole of the northern section of Chester a *Phytophthora cinnamomi* treatment area / buffer zone, with the long term aim of protecting the rare and endangered plants in the vicinity as well as the fertile agricultural lands to the south.

TECs not identified; dieback threat

Another major issue with the logging proposal is the threat to the unique flora in the area. The Threatened Flora Assessment Form, 09-03-07, has failed to identify the Threatened Ecological Community found within Chester 01, the Scott River Ironstone association, which is classified as endangered for two reasons:

1. Geographic range and/or number of discrete occurrences, and/or area occupied is highly restricted and the community is currently subject to known threatening processes which are likely to result in total destruction throughout the range in the short term future (within approximately 20 years);
2. There are few occurrences, each of which is small and/or isolated and very vulnerable to known threatening processes’

The ‘threatening process’ in both instances is *Phytophthora cinnamomi*

As can be seen on the map below, the Chester logging coupe is part of the only bushland (public land) where a Scott Ironstone TEC is found.

It must be asked why DEC has not identified this highly threatened community in any of the documentation for the logging proposal even though there are well known occurrences of distinctive community member *Calothamnus sp 'Scott River'* (P2) in the north, west and south of the coupe, and a search of the DAFWA website revealed the buffer zone of a TEC over part of the coupe. It is indisputable that logging, which most ecologists see as a high threat to biodiversity, would be a danger to this TEC occurrence.

Conclusion

We submit that dieback planning and pre-operational flora surveying at Chester is inadequate so far, as is likely to be the current flora survey of the proposed roadworks (which have not been accurately delineated). In any case, in this area of the highest species richness (1988 Comprehensive Regional Assessment) and known TECs, a whole of coupe survey is needed to identify occurrences and protect endangered flora. **Indeed, it would seem impossible to log Chester without conflicting with protection guidelines for the ironstone community.**

It is only common sense to protect what healthy natural ecosystems are now left in WA, rather than continue to run them down (unnecessarily in this case since the Chester operation will make a loss and substitute plantation timber is available) and incur great expense later for restoration (where it is possible). This is all the truer with escalating tree decline across the South West caused basically, it is thought, by the stress of climate change together with other degrading impacts.

Nevertheless, if the folly of logging this unique, beautiful and healthy forest is foisted on us, then it should be done according to the law i.e. dieback management must be properly planned and carried out, and TECs adequately protected. There seems little likelihood of this, and you can't blame interested members of the community for wanting to stop the logging entirely.

Lastly, we would much appreciate being sent a copy of the *Phytophthora cinnamomi* Management Plan and the final flora survey results and recommendations when they become available.

Sincerely

Rod Whittle
Secretary

cc Dr John Bailey, Conservation Commission of WA