



GOVERNMENT OF
WESTERN AUSTRALIA

SUMMARY OF PUBLIC SUBMISSIONS RECEIVED ON THE

WELLINGTON NATIONAL PARK EXPANSION PROPOSAL

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Background

The McGowan Government is expanding Wellington National Park. The expansion is proceeding as part of the Government's *Plan for Our Parks* initiative.

An extra 7,360 hectares of State forest has been proposed for addition to the national park. This addition will increase the overall area of the national park to 25,000 hectares. The Department of Biodiversity, Conservation and Attractions (DBCA) released the proposed boundaries of the expanded park for a 12-week public comment period from 19 December 2018 to 13 March 2019. The release of the proposal was supported by:

- a media statement from the Minister for Environment (19 December 2018);
- advertising in *The West Australian* (22 and 27 December 2018), the *Bunbury South Western Times* (3 January 2019) and the *Collie Mail* (27 December 2018);
- publishing the proposed boundary changes and additional area on the DBCA website; and
- establishing a dedicated email address to receive enquiries and submissions (wellingtonexpansion@dbca.wa.gov.au).

Overview of public submissions

Forty-six submissions were received from community groups, industry, government and individuals. Many of the submissions were comprehensive documents that had been carefully researched and presented valuable information on respondent's views and concerns. The Government appreciates the contribution of individuals and organisations in providing information to this process.

Table 1 below summarises the source of submissions and Table 2 presents the key comments and issues summarised by themes.

Table 1: Number of submissions by source.

Source	Number
Individuals	35
Community groups	5
Industry organisations	2
Companies	2
Government agencies	2
Total	46

Thirty-one respondents indicated their full or qualified support for the proposed expansion to the park, while 14 opposed the expansion, and the remaining one submission was a request for further information.

Support for the proposal centred on enhanced protection of the natural environment and increased potential for tourism and recreational opportunities to diversify the local economy. Opposition to the proposal focused on the impact to the forest products industry as areas with high quality sawlog resource currently available for timber harvesting would be set aside in the formal conservation reserve system. There was also concern that there was no evidence that a change in the land category would afford additional protection of forest values nor generate additional tourism and recreational opportunities.

The key themes identified through an analysis of the public submissions are categorised as follows:

- *Protecting forest values* - The proposed expansion of Wellington National Park will enhance the protection of forest values including biodiversity, water resources and cultural heritage, and help combat the adverse impact of climate change.
- *Tourism, employment and the local economy* - The proposed expansion of Wellington National Park will present wider opportunities to diversify the local economy and employment prospects through an anticipated increase in tourism, outdoor/eco-recreational activities and honey production.
- *Forest products and forest based industries* - The proposed expansion of Wellington National Park will adversely impact the forest products industry by removing access to high value jarrah sawlog resource. A flow on to this will be reduced investment and impact on local economies.
- *Management* - The proposed new boundaries of Wellington National Park should be modified to either increase (e.g. include Wellington Discovery Forest) or decrease the areas to be formally reserved. Management concerns identified included that the much larger area included in formal reserve system could increase risk of uncontrolled fires due to reduction in

prescribed burning; changing the tenure to national park would restrict the potential to apply silvicultural practices to forests to manage water flow and climate change; and future management would benefit from having some of the boundary segments realigned to alternative tracks or roads.

Outcome from analysis of public submissions

The boundaries proposed by DBCA were carefully selected to enhance the overall representation in formal reserves of vegetation types and fauna habitat, provide new foci for the development of recreation and eco-tourism opportunities, and incorporate Aboriginal heritage places, whilst seeking to minimise the short and longer-term impacts on the timber industry and other forest users.

Detailed proposals to add further parcels of State forest (mostly adjacent to the proposed additions) to the national park were based on further enhancing the representation in reserves of specific vegetation types, or improving connectivity to the existing national park. Each proposal was examined in detail, but rejected for various reasons. Analysis indicates the overall level of representation of the vegetation types in reserves (including beyond the Wellington National Park) is sufficient, although the Balingup vegetation type could be augmented in other regions. The case for adding further areas to improve habitat connectivity or other values is lessened by the fact that these areas will remain State forest and continue to be managed for multiple uses, including a number of informal reserves and fauna habitat zones that will remain undisturbed in the landscape. A proposal to add the Wellington Discovery Forest to the national park was considered unnecessary because the area is already a class 'A' reserve with a dedicated purpose (as determined through Parliament in 2004) that provides for eco-education and scientific research.

The need to balance competing objectives was a fundamental consideration in the review of public submissions. The timber industry submissions detailed potential financial impacts on direct economic activity (both local and regional), concerns around sovereign risk to future investment in the industry, and potential forest management costs. Ultimately, Government has sought to meet its commitment to expanding the national park in a manner that limits the impacts on industry. The submissions indicate that further engagement with industry will be necessary to meet this objective.

Changes to management boundaries were reviewed and some minor realignment will be incorporated in the final proposal to improve on-ground management and access.

Table 2: Summary of Submission Comments by Theme

No.	Comment	Response
General		
1.	Welcomes and supports the planned expansion of the Wellington National Park.	Noted. The Government is committed to expanding Wellington National Park to enhance the protection of conservation values and provide further tourism and recreation opportunities.
2.	Insufficient information available or more detailed information is needed to establish a position on the proposed expansion of Wellington National Park due to the absence of robust, independent data and detail to quantify the merits of the proposal or determine if trade-offs between alternative uses will result in a net benefit to the community, at either a local, regional or state level.	Noted. The Government recognises that the expansion will need to balance competing needs of forest-based industries. Consultation forms part of the process to expand the park and the interest of a range of stakeholders will be considered during the planning process.
3.	The planned expansion of Wellington National Park is not supported as the claimed benefits for the expansion are not justified by evidence. In the case of <i>limiting the impact of timber harvesting, firewood collection and extractive uses</i> , no information has been provided to assess this.	Noted. The Government recognises that the expansion will need to balance competing needs of forest based industries. Consultation forms part of the process to expand the park and the interest of a range of stakeholders will be considered during the planning process.
4.	The outcome should balance the interests of the timber industry, the natural environment and tourism.	Noted. The Government has sought to attain this balance in selecting boundaries for an expanded national park.
5.	The political decision has already been taken to change tenure from State forest to national park.	Noted. Expansion of the Wellington National Park was an election commitment, which necessarily involves some areas changing in tenure from State forest to national park.
6.	Timber harvesting, and current forest management practices are not sustainable.	Noted. The Government supports management of the forests in accordance with the Forest Management Plan 2014-2023, which includes provision for a native forest timber industry and provides the framework for the suite of forest management practices.
Protecting forest values		
7.	Support proposed expansion of the park, citing protection of forest areas in reserves, habitat for threatened and endangered species, vegetation complexes, improved connectivity and water production.	Noted. These outcomes were part of the objectives in designing the boundaries for an expanded national park.
8.	Highlights the wilderness and unique natural assets of the area proposed for reservation.	Noted. As above.

No.	Comment	Response
9.	Support proposed expansion of the park, as it promotes sustainability, resilience against climate change and global warming, reduces water run-off, supports native species and inhibits the spread of dieback disease.	Noted. As above.
10.	Additional areas above the proposed area need to be included in the park expansion. ¹ Addition of these areas seeks to increase connectivity and reduce edge to area ratio to support wildlife movement and biodiversity resilience in response to climate change and tourism impacts. Total expansion area would be between 10,000 to 12,000 ha.	Noted. The proposed expansion has been prepared with consideration of enhancing protection of biodiversity and providing for connectivity, particularly in the context of a drying climate. The further areas proposed to be added are State forest, which will continue to contribute to the maintenance of biodiversity, and which will retain undisturbed areas such as informal reserves and fauna habitat zones. Comparisons of the overall area of vegetation complexes within existing or proposed reserves on DBCA-managed lands (relative to present or pre-1750 extent) for those vegetation complexes in the additional areas proposed suggests there is already adequate representation, with the least well reserved being the Balingup vegetation complex. The proposal released for public comment incorporates a large area (approximately 1,150 hectares) of this complex, so further additions from other localities would be preferable to broaden the geographic spread in reserves. A substantial portion of the additional areas proposed have been harvested over the last decade to a range of silvicultural objectives.
11.	Supports the proposal to exclude the Wellington Discovery Forest from the proposed expansion of the Park, as this will allow the Discovery Forest to maintain its purpose as a place for education, research and practical demonstration of forest management practices	Noted. The Wellington Discovery Forest is not considered for inclusion in the Wellington National Park under the proposed boundaries. The Government is committed to maintaining and promoting the open air, practical education experience afforded by the Wellington Discovery Forest (including the range of activities identified in the CALM Act Part IV management plan). This facility provides further variety to diversify the recreation and tourism offerings of an expanded park.
12.	The proposed expansion will protect large green spaces.	Noted. The Government is committed to expanding Wellington National Park to protect conservation values and enhance tourism/recreation opportunities.
13.	Declaring the area as a national park or formally reserving the area will not provide greater protection of forest values, vegetation complexes and wildlife habitat. State forest does not preclude these values being protected.	Noted. While State forest provides for these values, the exclusion of periodic timber harvesting, firewood collection and extractive activities from the expanded boundaries of the national park is in part intended to promote diversification of employment and economic development opportunities in the area.

¹ Suggested additions include: Wellington Discovery Forest, Mamaballup State forest, area to the South East bordering the Glen Mervyn Dam, all Balingup, Grimwade and Catterick 1 vegetation complex groups, and Lowden North, Arcadia North and Mungalup West forest blocks.

No.	Comment	Response
14.	There is nothing within the additional 7360 hectares that meets the definition of a national park, as defined by the International Union of Conservation Nations. The area does not contain any examples of vegetation which would justify reservation under the "Comprehensive and Representative" (CAR) criteria which was used to determine areas of forest warranting conservation in WA's south-west forests in the recent past.	Noted. The proposed boundaries seek to increase representation of a range of vegetation complexes in reserves, in the overall context of meeting the commitment to expand the Wellington National Park.
15.	A viable timber industry does not compromise the areas' conservation values.	Noted. The Government is committed to expanding Wellington National Park to protect conservation values and enhance tourism/recreation opportunities.
16.	Expansion of the park would be justified to protect high quality areas from mining, as mining presents a significant risk to the forest values.	Noted.
<i>Tourism, employment and the economy</i>		
17.	The Donnybrook Regional Tourism Association would like the Glen Mervyn area of the proposed park to remain a dog access area. It is a popular dog exercise area.	Noted. The Conservation and Land Management Regulations 2002 provide for areas in national parks to be designated as dog areas. DBCA will consider designating the Glen Mervyn area for dogs.
18.	The proposed expansion of the park will support nature based, experience-themed tourism, linked to the South West's unique forest-nature sites, popular heritage and recreation sites, including wineries and eateries. "An expanded National Park would in effect extend and enhance the range of Regional tourism opportunities in this niche market."	Noted.
19.	The proposed expansion to the park and any subsequent visitation increase or tourism opportunities needs to be supported by comparable investment in infrastructure, e.g. toilets, maintain tracks and trails, as well as monitoring the area.	Noted. Infrastructure and maintenance requirements will be considered as part of finalising the park expansion.
20.	Support education programs regarding the biodiversity ecosystems and enable scientific research.	Noted.
21.	Proposal will generate employment for Aboriginal people e.g. land management, and tourism.	Noted. The Government recognises the opportunities that may arise for employment as Aboriginal Rangers and to grow Aboriginal businesses.
22.	The proposed park expansion will support bee populations and future honey production.	Noted.
23.	Help transition the Collie community transition from mining to tourism.	Noted. Expansion of the national park aims to provide alternative opportunities for regional development.

No.	Comment	Response
24.	Outdoors experiences include trails for hiking and walking, horse riding, mountain biking, canoeing and universal access; linking bio-diverse nature sites to towns and hamlets and sites of other interest.	Noted. The Government is committed to engaging with the range of stakeholders to define the new boundary for the park which accounts for a range of community, social and economic benefits.
25.	Expanding the park will make no difference to the area's current and future potential for recreation and tourism, including mountain biking, bushwalking, camping, cultural education and adventure activities. Plans or ideas to enhance recreation and tourism simply require commitment and funding, irrespective of tenure.	Noted. National park status will provide the required security and compatibility of tenure to facilitate long-term nature-based tourism and recreational opportunities. The Government will commence planning for visitor facilities and infrastructure.
26.	Without further investment in visitor facilities and trails in the expanded section of the park there is unlikely to be a significant improvement in visitor usage and experience. There is also a real risk that encouragement of unregulated use may result in adverse outcomes through erosion of unmanaged tracks, and spread of dieback.	Noted. The Government will commence planning for visitor facilities and infrastructure, and national park use will be regulated by DBCA.
27.	The proposal will not in itself "deliver positive outcomes for Aboriginal employment..."(as stated in the promotional literature). The potential for Aboriginal employment can be encouraged irrespective of the designation of national park or State forest.	Noted. New tourism opportunities will enable increased Aboriginal employment opportunities within the area.
<i>Forest products and forest-based industry</i>		
28.	The proposal is not supported as the expansion will again limit access to a high value, sustainable harvested timber resources. This impacts on resource security, ongoing investment in local communities and industry confidence with flow economic impacts to local communities.	Noted. Expansion of the Wellington National Park is an election commitment, which necessarily involves some areas changing in tenure from State forest to national park, with a commensurate reduction in access for timber production.
29.	Industry access to the proposed expansion area is currently permitted under the Forest Management Plan which goes to 2023. Any changes are made to permitted forest access, then new arrangements should be properly negotiated, and offsets/forest exchanges put in place to protect the industry and investor confidence.	Noted. Further engagement with industry representatives is planned.
30.	The current tenure of State forest in the proposed expansion already allows for the recreational and tourism activities suggested, and timber harvesting activities are conducted in line with a suite of guidelines, policies and management plans already ensure that adequate values are in reserve.	Noted.

No.	Comment	Response
31.	The proposed expansion is a serious threat to resource security and potentially sets a precedent for other single-issue activist groups in other locations	The boundaries proposed were carefully selected to enhance conservation, provide recreation and eco-tourism opportunities, and incorporate Aboriginal heritage places, whilst seeking to minimise the impacts on extractive industries.
32.	The supposed benefit to the communities, the environment, and the economy through the proposed expansion are disputed.	Noted.
33.	Proposal not supported. Once an area of State forest is declared a national park, sustainable timber harvesting, including firewood collection, is precluded. This will put greater pressure on surrounding areas of State forest to supply the State's timber requirements and local firewood needs.	Noted. DBCA will continue to provide sustainable access to timber products from State forest areas.
34.	Conversion of State forest to national park tenure will reduce the sustained yield of sawlogs and other wood products. The extent of this reduction needs to be quantified so that flow-on effects to industry and employment in the Collie region are made explicit. Reducing the supply of wood products to local sawmills at a time when Collie is seeking to transition away from its traditional dependence on coal mining may constrain opportunities for development of local industries based on value adding of high quality native timber products.	Noted. DBCA will continue to provide sustainable access to timber products from State forest areas.
35.	There is a lack of information on how the proposal will impact the timber industry.	Noted. Further engagement with industry representatives is planned.
Management		
36.	<p>The proposal will adversely affect:</p> <ul style="list-style-type: none"> • Industry's ability to practice silviculture in the area; • Fire management; • Forest disease management; and • Carbon emissions. 	Noted. DBCA will continue to be responsible for managing the values of the expansion area under the CALM Act, consistent with national park objectives.

No.	Comment	Response
37.	<p>Once an area of State forest is declared a national park, management options such as thinning are precluded. This is important as the south-west of the State continues to experience a drying climate. Regrowth jarrah forest such as that which is contained within the proposed 7360 hectares will very likely require proactive management in future to counter the effects of the lowering rainfall.</p> <p>Thinning has been demonstrated to be an effective technique for simultaneously enhancing forest growth and reducing the rate of groundwater decline in south-west forests and in some circumstances thinning can also lead to enhanced stream flow with benefits for water supply and aquatic ecosystems.</p>	<p>Noted. The balance of State forest areas will continue to be managed subject to practices outlined in the Forest Management Plan 2014-2023.</p>
38.	<p>Alternative proposal: The 7,360 hectares of state forest proposed for inclusion as national park remains under state forest tenure and continues to be managed for all forest values including essential managed wood fibre production.</p> <p>The revenue saved by not having to go through an expensive bureaucratic process invest in essential forest silvicultural and biodiversity protection and regeneration activities.</p> <p>Reintroduce essential native plant regeneration through regular planned, financed and prescribed burning.</p>	<p>Noted. Government is committed to expansion of the Wellington National Park.</p>
39.	<p>Alternative proposal: Question logic of adding all the significant parts of Yabberup, Arcadia and Lowden as indicated. Retain most of the area as State forest between Paterson Road and Pile/Mungalup Roads. This would leave reserved forest connecting to the existing national park in vicinity of the Bibbulmun Track. Some of the area to the southwest of Ferguson /Paterson Roads.</p>	<p>Noted. The boundaries proposed were carefully selected to enhance conservation, provide recreation and eco-tourism opportunities, and incorporate Aboriginal heritage places, whilst seeking to minimise the impacts on extractive industries.</p>
40.	<p>Recommended reclassification to land category Class A reserve to ensuring no 'depth limit'.</p>	<p>The expansion area will be class A national park.</p>

No.	Comment	Response
41.	If the expansion occurs, land tenure changes (gazettal) do not take place until after the allocated coupes (i.e. coupes on the current 3-year timber harvest plans and those not on the plan, but within the boundary of the proposed expansion) have been harvested under the usual conditions, and at least until the end of the current FMP providing industry with a degree of resource security, and improve the fire and disease management outcomes for select areas of the proposed national park.	Noted. Sustainable timber resources will continue to be made available in State forest subject to the requirements of the Forest Management Plan 2014-2023. DBCA will continue to be responsible for managing the values of the expansion area under the CALM Act, consistent with national park objectives.
42.	Offsets: Recommend that access by the forest products industry should be reviewed and made available to ensure resource security, quality and quantity. ²	Noted. Sustainable timber resources will continue to be made available in State forest subject to the requirements of the Forest Management Plan 2014-2023.
43.	Fair and adequate industry compensation: It is estimated that if the proposed expansion proceeds in the manner presented and coupes are removed from current and future harvest plans this will cost the industry up to \$50 million. Industry must be fairly compensated for any loss of available State forest for timber production associated with the proposed expansion.	Noted. Further engagement with industry representatives is planned.
44.	Commit to enhanced fire protection of assets near the park boundaries, including mechanical fuel reduction prior to gazettal, a fifteen-year return interval for mechanical fuel reduction, and no more than five years between prescribed burns upon the edges facing plantation assets.	Noted. DBCA will continue to be responsible for fire management in the proposal area in accordance with current fire management arrangements.
45.	Reduce the level of prescribed burning.	Noted. DBCA will continue to be responsible for fire management in the proposal area in accordance with current fire management arrangements.
46.	Consider a visitor exclusion zone for scientific research and rehabilitation activities.	Noted. Management of the park will be consistent with the objectives of managing national park tenure and the national park management plan.
47.	Insufficient resources allocated to DBCA to manage the expanded area.	Noted. DBCA will be suitably resourced to manage the proposal area.
48.	Help protect significant places of interest connected with the early timber milling industry.	Noted. DBCA will ensure heritage values are suitably addressed in its management of the area.
49.	Enable recreational boating on the Dam waters and microbe toilets in the area.	Noted. Management of the park will be consistent with the objectives of managing national park tenure and the national park management plan.

² FIFWA submission identifies specific options, e.g. fauna habitat zones

No.	Comment	Response
50.	Include suitable 'sports fish' in the Wellington Dam.	The Department of Primary Industries and Regional Development regulates fishing activity in Western Australia.
51.	Retain horse riding within an expanded park.	Noted. The Conservation and Land Management Regulations provide for areas in national parks to be designated as horse areas. DBCA will further consider horse riding activity in the proposal area through the management planning process.
52.	The proposal offers no additional protection to Aboriginal heritage places and other sites of cultural heritage is irrelevant. These sites are already protected.	Noted.



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