



Bushwalking WA
(Federation of Western Australian
Bushwalkers Inc)



**Western Australian Rogaining
Association Inc**

9 November 2018

Joint submission to W.A. Department of Biodiversity, Conservation and Attractions on the extension of WA's Regional Forest Agreement with the Commonwealth

KEY POINTS OF THIS SUBMISSION

- 1. The current RFA fails to ensure that the policy and planning framework of the FMP can be effective in achieving ecologically sustainable forest management.**
 - 2. The FMP is failing to adequately consider and protect healthy recreational opportunities close to the Perth metropolitan area for current and future generations.**
 - 3. The area covered by WA's FMP lacks any large CAR reserves in high quality, high rainfall jarrah forest. The area also includes extensive mining leases and longstanding mining operations.**
 - 4. The FMP avoids addressing bauxite mining as the greatest threat to WA's northern jarrah forest.**
 - 5. 'World's best practice' minesite rehabilitation strategies cannot successfully replicate or restore the original aged jarrah forest, wandoo woodlands and landscape impacted by bauxite strip-mining in the Darling Range.**
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Our interest

Bushwalking WA ('BWA') and the Western Australian Rogaining Association ('WARA') together directly represent the interests and concerns of the many individuals who depend on continuing and improved access to the natural forest environments near Perth for their healthy recreational pursuits. As the peak body for bushwalking / hiking in WA, BWA represents eleven member clubs (with around 1000 individual members) and the wider bushwalking community in WA. Bushwalking and walking in nature is recognised to be growing in popularity in W.A., especially with younger people, whose participation is most often through less formal online groups than BWA's traditional member clubs.

WARA, as the peak body for rogaining in W.A., also directly represents around 1000 members plus the many additional non-members who participate in events organised by WARA. Rogaining has been a popular recreational activity in the forest environments near Perth since its first event in WA almost 40 years ago.

Through their recreational activities across much of the state forests and reserves over the past half century, bushwalkers and rogainers have a unique insight into impacts that are affecting the social values of our forests and landscapes of the Darling Range near Perth, especially those values concerning recreation, visual amenity, scenic quality, and sense of place.

Outdoors WA provides advocacy, leadership and support to the WA outdoor sector including camping, outdoor recreation and outdoor education. Members include outdoor recreation,

outdoor education and adventure tourism operators as well as clubs, outdoor event organisers, retailers and professional associations. Outdoors WA promotes 'Outdoors October' to over 20,000 participants each year and supports the thousands of students, teachers, and community members wanting to outdoor recreate. It is critical that accessible activities like bushwalking are encouraged for the health, well-being and prosperity of our community.

Context

The shared vision and key goals set out in the National Forest Policy Statement (ca. 1992) for managing Australia's forests and achieving ecologically sustainable forest management ('ESFM') include, in part:

- **Conservation** - the maintenance of an extensive and permanent native forest estate to conserve the full suite of economic, social and environmental values for current and future generations.
- **Tourism and other economic and social opportunities** - sustainably managing our forests for a range of uses, including tourism and recreation.
- **Public awareness, education and involvement** - fostering community support for ecologically sustainable forest management and inviting public participation in decision-making.

The Regional Forest Agreement ('RFA') and the Comprehensive, Adequate and Representative ('CAR') reserve system provides a strategic framework for addressing these and other goals, while WA's Forest Management Plan 2014-2023 ('FMP') provides the policy and planning framework for managing public forests in the southwest and gives effect to the RFA objectives and commitments.

The area covered by the FMP lacks any large CAR reserves in high quality, high rainfall jarrah forest (i.e. above 1000mm isohyet; **Ref. 1**; e.g. Forest blocks: Balmoral, Cobiac, Cornwall, Holyoake, Inglehope, Mundlimup, Tumlo; **Ref.2**). The area also includes extensive mining leases and longstanding mining operations (**Figure 1**). Bauxite mining in the Darling Range near Perth commenced in 1963 and is supported by State Agreement Acts between the State Government and the miners. The mining operations may continue for another 50 years. Bauxite mining is a source of revenue to the State of WA and supports employment. However, the environmental legacy of the mining will be permanent and severely adverse. At least 60,000 ha (600 sq km) of mature forest will have been cleared and more than 60% of the northern jarrah forest and wandoo woodlands close to Perth will have been directly impacted or fragmented by mining and will include extensive areas of 'rehabilitated' former minesites.

The wider community remains mostly unaware or disinterested in the existing and long-term impacts of the mining, but as the metropolitan population grows in coming years the destruction of the jarrah forest and the loss of relatively undisturbed natural environments close to Perth city will come to be recognised as "*one of the greatest conservation blunders*" in WA and Australian history (**Ref. 3**).

In the above context it is vitally important to the public interest that the RFA through the FMP, is effective in pursuing its vision and key goals.

Our concerns

The FMP avoids addressing bauxite mining as the greatest threat to WA's northern jarrah forest. By condoning that omission the current RFA has failed to ensure that the policy and planning framework of the FMP can be effective in achieving ESFM. This failure is largely due to the parallel operation of other relevant legislation, notably the State Agreement Acts and WA's Environmental Protection Act 1986, which result in conflicting and contradictory priorities and decisions with regard to the goals of conservation and sustainable social opportunities, including for recreation. The WA Environmental Protection Authority (EPA) and State Government approvals of expansions and accelerations of bauxite mining under State Agreement Acts and the Environmental

Protection Act 1986 have failed to properly and transparently consider and protect the future land-use and public amenity values of the multiple-use State Forest areas. In some cases these State Acts appear to have facilitated the silencing of federal environmental controls, thus overriding the goals also of the RFA.

Key Performance Indicators, included in the FMP and addressed in the current draft mid-term FMP performance review, ignore the very relevant threats and actual impacts of mining operations and rehabilitated minesites.

The resulting combined effect of the current RFA, FMP and the State Agreements is that the public can have no confidence that values espoused in the FMP are being adequately and effectively monitored, addressed and protected with regard to bauxite mining and its environmental aftermath. Social values recognised in the FMP, including those concerning recreation and visual amenity, scenic quality, and sense of place cannot be effectively addressed and protected under the FMP while mining operations and impacts are managed and condoned under State Agreements. The State Agreement Acts, under which the bauxite miners have long operated in WA, require amendments; to better reflect present-day standards; to force much greater public transparency and accountability and community consultation on the part of the miners; and to ensure in the national interest that values intended to be protected under the RFA and FMP are no longer compromised by bauxite mining priorities.

Aspects of bauxite mining not being adequately addressed under State and Federal agreements:

i. Minesite rehabilitation

‘World’s best practice’ post-mining rehabilitation strategies cannot successfully replicate or restore the original aged jarrah forest, wandoo woodlands and landscape impacted by bauxite strip-mining in the Darling Range. The implications of this essential fact are being overlooked and/or ignored. One consequence is that recreational and other values espoused in the FMP are not being protected.

Continuing to assume that extensive mined areas of our forests can be successfully rehabilitated - despite the evidence of continuing failures of the rehabilitation experiment over the past half century - is incompatible with the “precautionary” approach to forest management intrinsic to the FMP.

Any consideration of miners’ future proposals for bauxite mining expansions should be required to include a rigorous and transparent triple bottom line (TBL) analysis by government; This must fully recognise and ‘account’ for the negative implications for longer term environmental and social values of such extensive areas of rehabilitated minesites as well as the economic benefits of the mining. (See also **Ref. 4.**)

ii. Sustainability for recreation

In parallel with extensive irreversible impacts of the strip-mining on biodiversity, landscape, unique soil profiles and water run-off, rehabilitated bauxite minesites within the Perth metropolitan area and beyond result in permanent loss of important recreational opportunities for current and future generations (e.g. Impact on bushwalking: **Ref. 5**).

Relevant threats to recreation recognised in the FMP (page 117) include: *“degradation of natural areas...that support recreation...”* The draft plan of Aug. 2012 included on page 141 a note that *“Management activities that disturb the landscape, in particular open-cut mining.... can have unwanted impacts if undertaken without appropriate planning.”* That note was removed in the final Plan.

Environmental Review and Management Programmes (ERMPs) such as the Worsley Alumina Pty Ltd Bauxite-Alumina Project Expansion ERMP of May 2005 (approved by EPA in 2008) typically address recreational values in a cavalier way which do not seriously consider or admit

to the long-term adverse implications upon future recreation of large rehabilitated minesite areas. e.g. Quote: *“In the long term, recreational values will be re-established in areas where mining activities will disturb such values”* (Worsley ERMP, 2005, Vol 1, p.3-114) and *“The visual impact of mining operations will not be permanent and all mined areas will be rehabilitated to reflect pre-mining landscapes.”* (Worsley ERMP, 2005, Vol 1, p.3-117).

The extent and condition of the vast areas of rehabilitated minesites will have profound impacts on the future land-use, public amenity values and recreational opportunities throughout the multiple-use State Forest areas. e.g. Expansions of mining (**Figure 2**) and rehabilitated minesites will increasingly impact on and greatly reduce recreational opportunities in the region in coming years. e.g. Long-popular, quality, traditional bushwalking areas to be lost to the mining will extend from Lane Poole Reserve in the south, across Mount Solus area and Bannister Hill, to beyond Mount Dale in the north (**Ref. 5**). Many customary bushwalking areas will be affected.

Bushwalkers and rogainers most value walking in high quality, undisturbed natural or near-natural environments (**Figure 3**). Today and in the future they will avoid the rehabilitated minesite areas as the severely altered condition of the landscape and vegetation is unsuitable for enjoyable bushwalking (**Figures 4a & 4b**): Vegetation species diversity is reduced, forest structure is dense and simplified, and earthworks remain for surface water control. Deep ripping for revegetation results in an uneven surface, generally with an extensive spread of boulders. Laterite ‘breakaways’ are striking, distinctive ancient landscape features of high visual amenity value at the edges of many bauxite ore ‘pods’ (**Figures 5a & 5b**), especially toward the eastern side of the Darling Range; They will be lost and replaced by an artificially smoothed landscape, devoid of those visual highlights.

iii. **Community consultation**

Processes under the State Agreements, following expansion approvals and during mining and rehabilitation works, minimise transparency and community consultation on the part of the miners. There is lack of engagement with the recreational community by the miners and the State Government (e.g. Issues raised in 2017 by the Dwellingup Community Compact; **Ref. 6**). (<http://www.dwellingupwa.com.au/home>).

Under the State Agreements the miners are required to submit updated mining plans annually for approval to a multi-agency liaison group (‘MMPLG’) so that the activities of other forest users can be integrated. But this group has no community representation or public accountability. The miners’ community consultation processes focus on ‘local’ communities, bypassing the broader community including bushwalkers, rogainers and other recreationists. The miners’ claimed “social licence to operate” cannot be legitimate in the absence of transparency and proper consultation with the community on the impacts of the current rate of mining expansions and the export of unprocessed bauxite. (See also **Ref. 4**.)

References

- Ref. 1:** Bradshaw, F.J., (2015) [Reference material for jarrah forest silviculture](#), Forest Management Series FEM061, Department of Parks and Wildlife, Perth.
- Ref. 2:** Forest Products Commission (2018) [Defined Forest and Plantation Areas \(North\)](#) – DBCA, Parks & Wildlife Service map (online pdf).
- Ref. 3:** Underwood, R., (2007) [Bauxite Mining in Jarrah Forests](#), blog article.
- Ref. 4:** Brueckner, M., Durey, A., Pforr, C., & Mayes, R. (2014) [The civic virtue of developmentalism: on the mining industry's political licence to develop Western Australia](#), in Journ. Impact Assessment and Project Appraisal, 32:4, 315-326.
- Ref. 5:** Osborne, D.G., (2018) [Bauxite mining](#), WalkGPS.com.au web page.
- Ref. 6:** Dwellingup Community Compact, (2017) [Bauxite Mining in and around Dwellingup – Draft Position Statement](#).

Figures (pages 6-9)

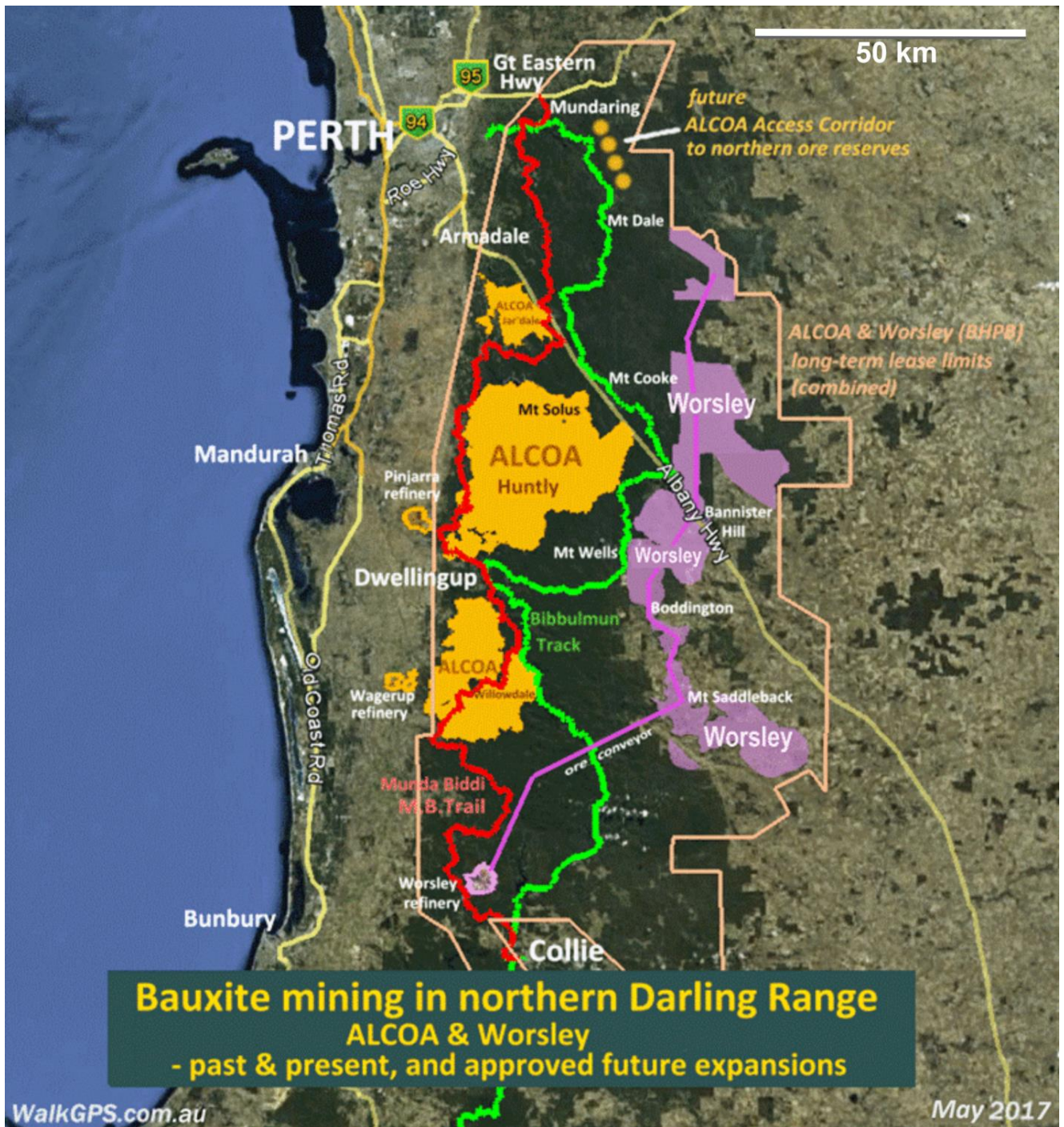
- Fig. 1:** Map of bauxite mining leases and approved (to date) mining areas in forests of northern Darling Range
- Fig. 2:** Typical extensive, current strip-mining (Alcoa Huntly operations)
- Fig. 3:** Typical unmined northern jarrah forest (Eagle Hill area).
- Figs. 4a & 4b:** Typical rehabilitated minesite (Jarrahdale area, approx. 40 years post-rehabilitation).
- Figs. 5a & 5b:** Walkers on the rocky slopes of typical laterite breakaways in the wandoo woodlands (eastern Darling Range) before mining.

FIGURES

Figure 1 – Map of bauxite mining leases and approved (to date) mining areas in forests of northern Darling Range

Map colour key

- Combined outer limit of ALCOA and Worsley lease areas in pale orange
- ALCOA past and approved-to-date mining envelopes in orange.
- Worsley past and approved-to-date mining envelopes in pale purple.
- Bibbulmun Track walk trail in bright green.
- Munda Biddi Mountain Bike Trail in red.



(Figure courtesy www.walkgps.com.au)

Figure 2 – Typical extensive, current strip-mining (Alcoa Huntly operations)

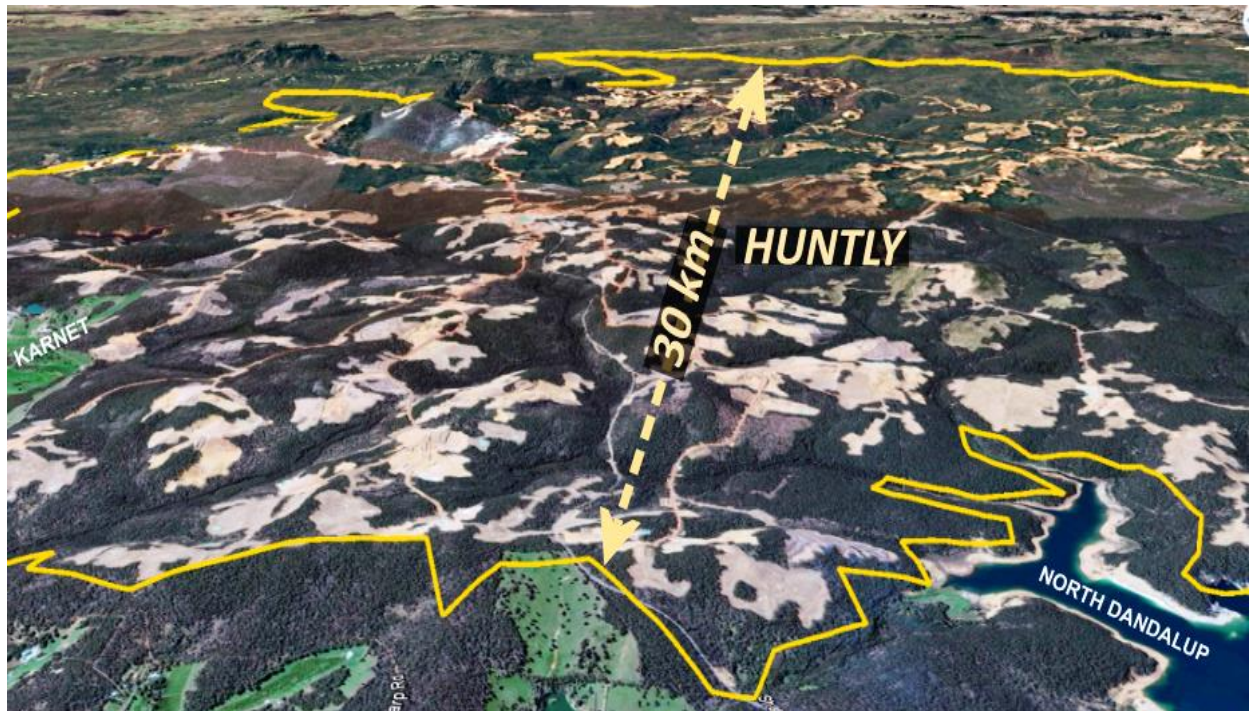


Figure 3 – Typical unmined northern jarrah forest (Eagle Hill area)



Figures 4a & 4b– Typical rehabilitated minesite (Jarrahdale area, approx. 40 years post-rehabilitation)

Figure 4a



Figure 4b



Figures 5a & 5b – Walkers on the rocky slopes of typical laterite breakaways in the wandoo woodlands (eastern Darling Range) before mining. (Such landscape features cannot be effectively restored post-mining and will be replaced by smoothed, graded slopes.)

Figure 5a



Figure 5b

