

# **Friends of the Box-Ironbark Forests (Mount Alexander Region) Inc.**

ABN: 40 489 904 108 A0037461H

ph: (03) 5470 5161 email: info@fobif.org.au

PO Box 322 Castlemaine Vic 3450

[www.fobif.org.au](http://www.fobif.org.au)

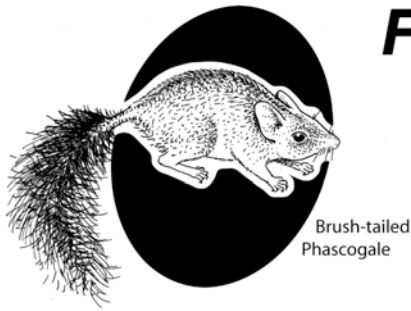
7 April 2010

Dear Commissioners,

Attached is a second FOBIF submission to the Commission, this one mainly concerned with fuel reduction burning, which we understand to fall under item 7 of the Commission's terms of reference: land use planning and management.

Sincerely,

Bernard Slattery  
Secretary



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## **Preface**

The Friends of the Box Ironbark Forests is a community organization with over 100 paid up members, centred in Castlemaine. Our aims can be found on our website as above.

Please note that we have already made a submission directed at the problem of unwise housing developments in bushland. We are grateful for the opportunity to make this second submission on a separate, but related matter: that of fuel reduction burning. It concerns principally the box ironbark region in which we live.

## **Fuel reduction: counting hectares or practising adaptive management?**

The Friends of the Box Ironbark Forests have consistently defended DSE Fire Protection Plans against those who, on the one hand, have urged massively increased burn areas [the 'counting the hectares' approach], and those, on the other, who oppose all fuel reduction burns.

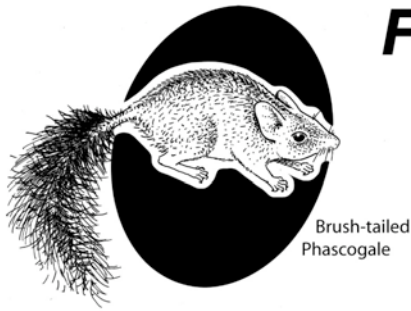
We have adopted this position on the basis that the DSE plans, with their zoning principles and differentiation of asset protection and ecological burning, have at least provided a basis from which to use fire constructively in the landscape.

We have never, on the other hand, been satisfied with the conduct, or the detailed scientific rationale behind the plans, and have consistently and unsuccessfully argued for increased monitoring and research to accompany all operations, along the lines of the 2004 COAG enquiry recommendation of

*an adaptive management approach to setting fire regimes that are appropriate for biodiversity conservation. Such an approach should:*

- *make explicit the biodiversity objectives;*
  - *recognise lack of knowledge and clarify questions that need to be answered;*
  - *design burning prescriptions that can answer these questions;*
  - *devise and fund monitoring and other data-collection activities;*
  
  - *review and communicate results; and*
  - *use the new knowledge to modify the management prescription.*
- [Finding 6.7]*

This is in fact DSE's own policy of adaptive management, which is unfortunately more honoured in the breach than the observance. We have never seen an example of a burn operation in which substantive changes have been made in the light of research



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and reflection on previous operations. It is worth noting in this connection the observation of David Lindenmayer: ‘A check shows over 2000 references in the scientific literature to adaptive management in the last 10 years. Yet there are almost no published examples of adaptive management anywhere in the world.’

[*Biodiversity: integrating conservation and production*, ed. Lefroy et al, CSIRO 2008 p 22. Our emphasis]. Adaptive management is a good idea which has never been implemented, either through lack of funds, or because the culture of land managers dismisses it as airy fairy theory.

The conduct of management burns since the Parliamentary Enquiry of 2008, and more particularly since February 2009, has convinced us that any pretence at adaptive management, and any notion of using fire for ecological purposes, have now ceased. DSE officials, under heavy political pressure, are now burning more widely and more severely than before, and our fear is that this will continue with long lasting destructive effects on our bushland. Certainly our own confidence in DSE operations has been shaken by recent experience in our region, specifically an Autumn 2009 burn on Mount Alexander, which through carelessness or worse burned ten times the planned area, destroying hundreds of old growth trees; and the 2010 burn at Wewak Track in the Castlemaine Diggings National Heritage Park: this latter, supposedly a ‘broad area reduced fuel mosaic’, in fact resembles a full on bushfire site.

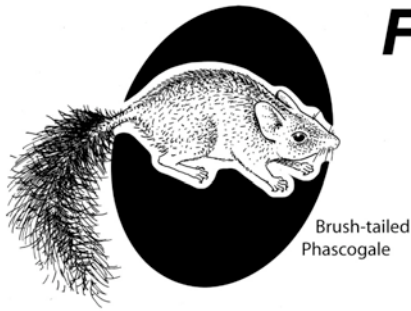
Media reports of the Royal Commission hearings may even be contributing to this change of practice: it was widely reported in the media that the scientific panel had recommended increased burning of foothill forests, but the more nuanced views revealed in the transcript of the scientific panel hearings were not mentioned, especially the heavy emphasis on strategic, well researched operations.

We are especially concerned that a senior government minister said to us in March this year: ‘The Commission is certain to make recommendations which could cost a squillion dollars. We are going to have to make decisions about which of these we can afford.’

To us, this is a clear signal that governments, of either party, will tend to implement Commission fuel reduction recommendations only in the crudest manner, and that the very thing recommended by the scientific panel: informed use of fire, as opposed to counting hectares burned, will be lost in political calculation and the desire to be seen to be decisive.

## **The Scientific Panel at the Royal Commission**

We wish to make the following observations on the basis of our study of the transcripts of the Commission:



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## 1. Environmental history

One of the aims of management burning is to mimic the conditions in which our forests and woodlands developed. Thus it should be guided by a sense of the history of the forests as far as we know it. It is disappointing that little or no reference was made to this in proceedings, and that the scientists based their statements on what Dr Tolhurst admitted was research based on 'relatively small fires.'

The lack of historical perspective which characterized the panel's discussion is disturbing. We are not sure if this related to its brief, but the panel appeared quite insouciant about the matter—or even erratic, as when Mr Cheney made the extraordinary statement that Aboriginal people burned in order to 'protect themselves' [feb 22]. This statement was immediately corrected by Dr Gill, who observed that we are in fact ignorant of Aboriginal burning practices in SE Australia.

**We hope that the Commission will consider the vastly different fire histories of the many different forest environments and plant communities in Victoria when making its recommendations.**

## 2. The figure of 5-10%

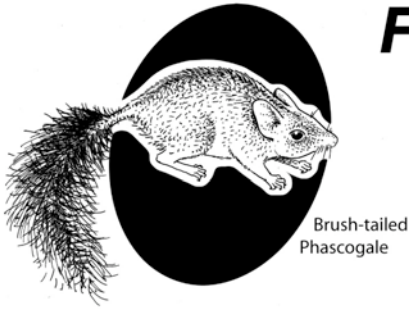
There appeared to be a consensus in the panel that about 5-10% of our 'foothill forests' could be burned each year, and we take it that Dr Clarke was speaking for that consensus when he said that

'this is what would be required to have an appreciable effect on the residual risk, and it is not saying anything about the ecological consequences of that to the places you are applying it. So it is a value judgment about how much you value the assets in that place to achieve an appreciable reduction in risk.'

In other words, we should take the chance of causing ecological damage if the assets we are protecting are worth it.

Without necessarily contesting it, we wish to make three comments on the 5-10% figure.

First, it is a crude way of envisaging a program of burning. Dr Tolhurst's comment is worth quoting here: 'I think it also needs to be said that the proportion of the landscape burnt also depends on how it is applied across the landscape in terms of its strategic location. So, for example, there was a study done by Dr Karen King that ... basically saw strategically located



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prescribed burning on 5 per cent of the landscape achieved similar to what 10 or 15 per cent achieved where it was randomly located.’ **Our fear, in the light of our recent experience of DSE practices, is that the random counting of hectares [a practice criticized by the panel] will take precedence over any ‘strategic’ objective.**

Second, and following on from this: we urge **that any statement of ‘percentage’ objectives be accompanied by a requirement for different landscapes to be mapped to clearly show the fire history of the area, and the strategic, ecological and safety effects of the proposed burns.**

Third, and related to the first two: **we are at a loss to understand how it has become a priority to burn widely [and often, in our view, indiscriminately] in bushland, when waste lands closer to settlements are crying out for fuel management by a variety of means.** We refer here in particular to the **Bracewell Street fire in Bendigo in February 2009, which gained its force in pampas grass infested gullies, and burned largely through wasteland.**

### 3. Foothill forests and box ironbark forests

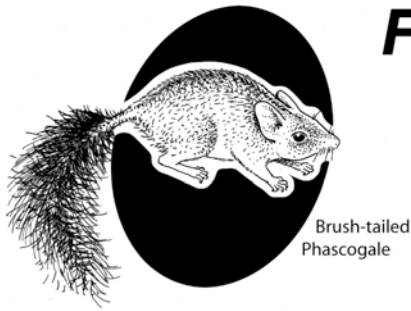
Some discussion took place in the panel as to what exactly was meant by ‘foothill forests’. **In our view box ironbark forests and woodlands should not be considered in the same category as the sclerophyll forests like, for example, the Wombat forest.**

The two forest types should be considered as completely distinct, both from the point of view of bushfire prevention and ecological effects of reduction burning. We refer here to the research report *Ecological Burning in Box Ironbark Forests* [Tolsma, Cheal and Brown: DSE/North Central CMA/Arthur Rylah Institute 2007]: these forests have a relatively infrequent need for fire [the researchers propose fifty year intervals], are fragmented, and carry relatively low fuel loads. The researchers concluded:

‘This research has highlighted that we know little about the responses to fire of specific Box-Ironbark flora and fauna species and communities, and even less about the temporal and spatial patterns of burning that might maximise total biodiversity.’ [Phase 2, page 5]

and

‘few Box-Ironbark species rely on fire for germination, and the majority will persist in the community as plants or seeds for 50-



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100 years (Tolsma *et al.* 2007), and the imperatives for regular burning are not as strong as in other, more fire-prone vegetation. Burning need not be undertaken "just in case", and the onus is on the land manager to prove a clear case for burning.' [p 21]

If this report is correct [and we have seen no effort to refute it], there is little need to conduct 'ecological' burns in these forests, and the current pretence that there is should be abandoned.

Please note that we are not here referring to 'asset protection' burns, close to settlement.

#### 4. Destroying the bush to save it

The panel appeared to argue that in a warming climate we are likely to be faced with more mega fires, and that in the face of this menace, we are justified in taking the ecological risk of extensive fuel reduction burns.

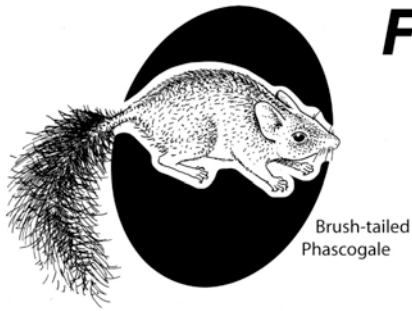
We do not dispute the general lines of this argument: but our submission argues that whatever reduction burns are done should be properly planned, strategic, and backed by appropriate and accumulating research. Otherwise the effect of the burn program will be, over perhaps a longer term, the same as that of a destructive bushfire: irrevocable depreciation of the biodiversity of the box ironbark environment.

**This is not an argument for delay: it is an argument for resources.** And it is an argument that in the box ironbark region, reduction burns should be conducted with strict regard to the strategic objectives of community safety: not in pursuit of an abstract statistic which will inevitably entice authorities to 'hectare counting'.

**The panel was clearly in favour of respect for research, improved training for fire operatives, and the conduct of fire as part of general forest management, not as a narrow skill divorced from ecological understanding. These things all cost money, in a State where natural resource management has been done on the cheap for generations. We trust that the commission will make its recommendations with this in mind.**

#### **A Perspective**

The French Secretary of State for Housing has been quoted this week as announcing that between 1,300 and 1,500 houses in flood zones in the country's south are to be



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demolished and a 'red zone' declared where no further housing will be allowed. The zones are in Charente-Maritime and Vendee, devastated by cyclone Xynthia, with the loss of 53 lives. In Charente two thirds of the houses to be demolished are primary residences. Average compensation of 150,000 euros per house will be paid.  
[*Libération* 4/4/2010]

The French action, though striking, is not altogether surprising. In 2004 COAG said:

The Inquiry supports the view, expressed in *Natural Disasters in Australia*, that land use planning that takes into account natural hazard risks is the single most important mitigation measure for preventing future disaster losses (including from bushfires) in areas of new development. Planning and development controls must be effective, to ensure that inappropriate developments do not occur. [Finding 6.1]

We are not proposing demolition of existing settlements in our forested areas: but we do think the Commission should at least

- **make a strong recommendation opposing new settlements in dangerous areas;**
- **strongly emphasise that fuel reduction programs should be conducted with appropriate regard for ecological values;**
- **refrain from making a global recommendation for fuel reduction, but treat the different ecological zones of the state according to their distinctive values.**

*Bernard Slattery*  
FOBIF Secretary



Brush-tailed  
Phascogale

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