



HAMILTON FIELD NATURALISTS CLUB

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Submission to Fire Code Review 2005 – August 2005

Submission to May 2005 panel at Hamilton – issues arising

Two of our members made a combined personal submission to the consultative panel at Hamilton in May 2005 – and provided a written submission (see attached). We are dismayed to see that none of the issues that we raised have received attention in the current draft. That is particularly disappointing, given the enthusiasm shown for the new Portland-Horsham proposed Management Plan, where biodiversity has been accorded the highest order of priority.

In brief, we were concerned about the impact of current fire suppression tactics on biodiversity values. Hollows are critical for the survival of many bird and mammal species in an area, including Powerful Owl and other species of owl, Red-tailed Black Cockatoo and other parrots, Brown Treecreepers, Yellow-bellied and Sugar Gliders, Brush-tailed Phascogales, Ring-tailed and other Possums. The loss of hollows is a loss of habitat and at the current rate of loss of 200-500 year-old trees the biodiversity of this region is in peril because few will be left in 50 years time. Management protocols have failed to protect them, and the Code of Practice has failed to highlight the problem.

Specific issues we raised were:

- **Loss of mature/old hollow-bearing trees that have caught fire** during control burns or wildfires and then have been bulldozed or cut down during or after the fire – much of this loss could be averted if the fire practices were altered, new machinery obtained and the fire control staff properly educated as to the value of the resource.
- **Protection of mature/old hollow-bearing trees in areas to be fuel-reduced** - manual efforts are needed to remove some of the heavy litter from around these valuable trees before the fires are lit. That is very rarely done and results, for example the Cobboboonnee area, are obvious to all.
- **Prohibit the bulldozing of the large, hollow-bearing edge trees around proposed burn areas** – past experience in the Portland Region has shown that many of the habitat trees retained for biodiversity purposes during forestry thinning operations are then knocked down under the guise of fire protection.
- **The conduct of fuel reduction burns** – political pressure following the fires in the Australian Alps in 2003 has resulted in huge areas of land being burned in summer-autumn at a time when the fuel moisture levels are very low, there has been no morning mists or rain, and the meteorological conditions appear to have been borderline for obtaining a partial (mosaic) burn with a low flame height. There has been an unnecessary loss in biodiversity, with many large, old trees being destroyed and endangered species on the ground also being killed (as at T&W Rd, Portland in 2005). If politicians require such large areas to be burned annually then they need to supply more resources to enable the job to be done when the conditions are appropriate.
- **A Fauna & Flora Officer of DSE should be required to approve any fuel reduction burn before it begins.** Fauna and flora guarantee legislation for threatened species and their habitat is being flouted – fire is a threatening process, and it is being disregarded.

We request the review team to look again at our submission and address the issues that we have raised.

Other matters arising from the July 2005 draft

There are other specific points that we would also like to raise. We will deal with these below.

PART 1

1.1 Background

Point 7 and Point 10 – while the points made are true, where people live is a matter of choice – when people choose to build in fire-prone areas they do so with that knowledge and therefore cannot expect that the biodiversity of the forest or woodland will be destroyed to accommodate their wish to be “fully” protected. That point has not been made in the Code Review and it should be made.

Point 8 – the main source of fire ignition is the action of people. And some of the State’s rich flora is severely damaged by fire! That point needs also to be made. The adverse impacts of fire on the ecology have not been mentioned. The emphasis has been on positive aspects. That needs to be addressed to give a balanced picture.

Point 9 – this is well put as far as “natural” fires are concerned but fails to mention the impact of fire control/prevention practices on biodiversity (e.g. the examples we have raised). Unless specific examples are given, managers will not take appropriate steps to protect the resource.

1.2 Application of the Code

What can they public do if they see obvious breaches of the Code? Is there an avenue of complaint whereby compliance can be sought and obtained? Clearly, something is required in order to achieve accountability.

1.10.2 Prescribed Burning Principles

The problem here is that statements such as “environmentally sensitive” or “principles of environmental management”, or “maintenance of biological diversity” etc., mean very little to most managers. They are just words. The only way one can see that the intentions are observed is to ensure that a trained ecologist reviews the fire plan and inspects the conditions on the day, before the fire is lit. Someone is then responsible for the conduct of prescribed burning “*in accordance with approved standards and prescriptions*”. All the evidence from the past shows us that biodiversity rhetoric means nothing to a fire crew who are untrained in those aspects or uncaring.

1.10.4 Environmental Management Principles

This section needs to make a specific mention of the need to protect large, old habitat trees (whether at that point they contain hollows or not). See our submission above – specific issues. Unless these things are specified then nothing will be done. Generalities mean very little to managers or fire crews.

PART 3

3.2 Planning for burning operations

The comments made for 1.10.2 also apply here. Also, we believe that more stringent limits should be set for the burning of environmentally sensitive areas.

3.5 Records

These should also note impacts on fauna – e.g. sightings of rare fauna, death of such animals and the impact of the fire and other actions on habitat. This should also be part of **Research (3.7)**

PART 4 WILDFIRE

There is little in this section that relates to our concerns about damage done to large, old trees during the wildfire suppression and mop-up stages. We want to see that rectified. The environmental consequences of cutting down these trees have been all but completely ignored in recent years. It is a most serious problem. Better equipment must be provided to enable fire crews to extinguish fires aloft in such trees.

4.3.4 Incident Action Plan – this may be relevant place to specify such actions as those above.

4.3.7 Operational Guidelines – there is no mention here of the concerns that we have related above. This is the place for further comment. e.g. another sub-section entitled “**for minimising impacts on large, old habitat trees**”)

SUPPORT DOCUMENT – DRAFT CODE of PRACTICE

Strategic Fuel Reduced Corridor. The last sentence of the second paragraph appears to be nonsense. The width of such a fuel-reduced corridor would seem to need to be several kms wide to achieve the stated objective. Such a width cannot be allowed. Also, there are words omitted from paragraph 4.

PR Bird

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