

## File uploaded to DEECA Bushfire Management Consultation 17 August 2023 as part of RFPG submission to consultation

This document is extremely disappointing, particularly in relation to the ecological impact of planned burning on which this submission is mainly focused.

The draft strategy conspicuously avoids saying anything that will allow DEECA and the Government to be accountable. There are more than a dozen references to 'continuous improvement' or 'continuously improve', but no detail on how such 'improvement' should be measured. The 'Outcome Indicators' for domain 2 (ecological resilience and nature conservation) are abstract and unmeasurable, so allowing DEECA to continue with a business as usual approach and avoid accountability. Indeed the whole document seems to just pave the way for business as usual.

While the draft strategy acknowledges that '*there will be increased threats to ecosystems posed by the high-frequency, high-intensity bushfires likely to result from the changing climate*', it gives no indication about how DEECA considers this more severe fire outlook will affect planned burning regimes. In particular, it does not admit that more frequent and more severe bushfires call into question the entire planned burning approach or acknowledge the evidence that planned burns may be of little help arresting such fires (see for example, '*The case against prescribed burning to fight bushfires*' by Karen Middleton in The Saturday Paper 16 July 2022).

The draft strategy is also not short on meaningless gobbledegook, such as '*to monitor [climate change] impacts, the sector will develop trigger points, which will activate escalated ecosystem protection measures*'. What are trigger points? Will they be measured? Local or statewide? What might 'escalated ecosystem protection measures' be?

It is accepted that bushfire management in an ever hotter climate is complex and uncertain, but it is not clear what, if anything, will change as a result of the adoption of this draft strategy. For example, the document states that the *fuel management program will continue to deliver precision burning close to assets (such as physical structures, cultural sites and environmentally important locations). This is complemented by burning in larger areas further away from assets.* This sounds very much like business as usual, despite the next sentence saying that new approaches 'will be considered'. What new approaches? No amount of fuel reduction activity in more distant areas will prevent spotting and ember attack in extreme fire weather conditions.

The draft strategy is replete with statements about what DEECA, or 'the sector', will do, but despite the extensive data that DEECA has collected to date, there is little discussion of key changes in bushfire knowledge over the past 10 years or so.

- There is no reference to the latest understandings of how planned burning can lead to the maintenance of a flammable shrub layer that itself risks creating the condition for more extensive and/or severe fires in the future as illustrated by the work of Phil Zylstra and colleagues in WA (see for example <https://soundcloud.com/besjournals/forests-that-keep-fires-small-and-how-they-do-it> and <https://www.youtube.com/watch?v=Af36dt017A0>).
- There is no reference in the draft strategy to how the early end to native forest logging might impact on approaches to fuel reduction management. Indeed it refers in one place to the protection of 'timber values' even though these will become zero in Eastern Victoria in 2024.
- The draft strategy refers to 'critical knowledge gaps' in relation to fire regimes and ecological resilience but gives no detail as to what such gaps are seen to be.
- There is no reference to the results of a 2021 consultancy DELWP commissioned on *Measuring Ecosystem Resilience in Strategic Bushfire Management Planning*.
- There is no data or argument about the shortcomings of Phoenix RapidFire as a planning tool, much less as a means of specifying 'risk reduction', despite the criticism of it in VAGO's

2020 'Reducing Bushfire Risk' audit report<sup>1</sup>. The Draft Strategy simply says that Phoenix RapidFire will be replaced by a new model, SPARK, but offers no information on how SPARK may be an improvement.

Also absent from the draft strategy is a recognition of major infrastructure changes affecting bushfire management and preparedness that have occurred since the current bushfire management regime was established decades ago. These include:

- property buybacks in flame zone locations,
- BAL building rules making homes more fire resistant,
- increased community awareness of fire hazard leading to owners making their properties more defensible so increasing the 'stay and defend' option,
- the strategic firebreaks program improving fire-fighter access, safety and backburning, and
- the modernisation and upgrading of DEECA's fleet of fire-fighting appliances.

All of these changes have implications for the current fuel reduction program but such implications remain unexplored. And why is the *2012 Code of Practice for Bushfire Management on Public Land*, now over a decade old and presumably expired under S.31(1) of the *Subordinate Legislation Act 1994*, being left entirely undisturbed?

A section headed '*What will change*' is essential if 'the sector' is to be able to hold DEECA and the Government generally to account.

While some might suggest the response to this hothouse future should be a dramatic scaling up of the planned burn program, the ecological consequences of such a shift would have severe ecological consequences as well as increasing the risk of escapes, especially given the ever-shrinking window of suitable weather conditions. In NSW high frequency fire resulting in the disruption of life cycle processes in plants and animals and loss of vegetation structure and composition is recognised as a Key Threatening Process in Schedule 4 of the NSW *Biodiversity Conservation Act 2016*. Given this likelihood, should not bushfire mitigation investment be focused far more on improved early detection and suppression? This is a key question for setting bushfire management directions into the future but is largely sidestepped in the draft strategy.

As RFPG proposed in April in a letter to Minister Stitt, the Government should establish a proper ecological review of planned burning across all Victoria's different forest types, with public and expert input, in keeping with Victoria's commitment in all RFAs (e.g Central Highlands RFA CI 62C(c)) to limit adverse ecological impacts. As far as we know, while there have been many inquiries into bushfires, there has never been such a public review focused on this aspect of Victoria's bushfire protection regime.

Rubicon Forest Protection Group  
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1 As an example VAGO found that '*DELWP's fuel type maps and fuel accumulation curves have not undergone any broadscale verification. As a result, their accuracy and precision are not known. This means that DELWP may be overestimating or underestimating risk levels when using Phoenix RapidFire to simulate bushfires.*' The audit report also states that '*DELWP reconstructed the eight most significant Black Saturday bushfires as part of its Black Saturday Fire Reconstruction Project to understand how accurately Phoenix RapidFire predicts real bushfires. The draft report is currently undergoing scientific review and editing and is yet to be finalised.*' However the draft Strategy makes no reference to this work.