

Fire & Emergency Management Division
DELWP
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Via email: fuel.management@delwp.vic.gov.au

Comments on April 2015 recommendations

We commend the Andrews government for initiating this review. EEG is generally very pleased with the recommendations of the review. However there are still a number of areas that require more consideration, research and science-based management.

In summary - given the new era of increased fire risk, we believe the solutions must match possible future scenarios. These solutions - ***based on evidence and science*** - should include:

- better home designs and personal preparedness
- fire bunkers
- fire suppressing vegetation
- early detection and rapid response
- review of financial incentives to keep fires going
- power line safety, and
- maintaining healthy damp forests and water catchments

We agree that a one-size-fits-all burn program is unscientific and ineffective.

Issues not addressed in this review include:

- ***Changes that need to be made regarding acceptable outcomes of a planned burn. Much more detail is needed and consequently accountability.*** Given the appalling assessment given on the burns impacts on environmental values, ecological integrity and ecosystem services (0/4).
- The hazardous trees policy and its implementation are in need of urgent review. The manner in which the machinery operators interpret a 'dangerous tree' and determine which trees are to be knocked down is

extremely lax. There must be no financial incentives to take out far more than is needed. ***The loss of hollow bearing trees is listed as a threatening process and so should not be left up to machinery operators.*** An arbourist should be employed to determine if trees are a danger. DELWP's 49,000kms of tracks and roads contain critically important habitat and must be seen as environmentally valuable.

- ***Burn plans should include more specifics*** of what are the desired outcomes and the environmental values at stake. The old 'let-'er-rip' method is out-dated.
- The Department needs to ***explore other options such as rapid first strike attack methods, bunkers, natural and enviro-sympathetic fuel-reduction methods and heat sensing remote cameras*** to name a few.
- The preferable ***age ranges for various EVCs in each ecosystem remains an uncertainty.*** This is another area where science and sound knowledge must be applied rather than guess work based on limited information. ***Continued burning at minimum TFIs must stop.***
- Most importantly, there is still ***no sound science on the effectiveness of burning – especially in certain vegetation types.*** Education of the public and fire managers is essential to bring about a change in attitude and understanding. Burning has not provided the security it claims to.

EEG is also ***very opposed to a continuation of planned landscape burns for yet another season*** while the Department puts in place a new risk based approach. With a ***13/48 score***, it is shocking proof of the horrendously costly but ineffective nature of these burns. They are expensive, ecologically destructive, mostly ineffective, unmonitored, unaccountable, inflexible and often non-compliant. We would like to see a ***move to the risk-based approach as quickly as possible using those methods which can be easily deployed.***

We are pleased to see an acknowledgment that:

- ***smoke is an issue*** which must be addressed and that it is a serious consequence of planned burns that impacts on community health as well as commercial activities.
- A need for ***performance measures for community engagement*** activities. However we would also like to see community engagement developed in a way that allows everyone to have ***input in a comfortable and non-threatening environment.***
- ***Cost-benefit estimates*** of risk-reduction vs a hectare-based policy.

- **Public reporting on bushfire risk and ecosystem resilience** (though *more research is needed* to make this reporting *meaningful*).

We look forward to seeing these recommendations adopted. We would also like to see the government adopt measures to ensure a risk-based policy is **based on science rather than public fears**, and that the hundreds of thousands of hectares of ***ecosystems unnecessarily burnt over the years are now allowed to recover***.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Redwood', with a stylized flourish at the end.

Jill Redwood
Coordinator