SUBMISSION

Australia's Native Vegetation Framework Consultation Draft

April 2010

The National Association of Forest Industries (NAFI) welcomes the opportunity to comment on the consultation draft of 'Australia's Native Vegetation Framework'. This framework sets out high level policy goals for the effective management of Australia's native vegetation at national, state and regional levels.

Australia has 147.4 million hectares of native forest, with 23 million hectares in conservation reserve and 9.4 million hectares in public forest where timber harvesting may be permitted subject to environmental regulation. Australia has a further 2 million hectares of plantation forests.

NAFI broadly supports the policy intention and goals of the draft framework, which should acknowledge the current regulatory and adaptive policy framework that underpins the sustainable management of native and planted forests for wood production and a range of other important values, including biodiversity, watershed protection, recreation and carbon sequestration.

While supportive of the over-arching framework, NAFI is concerned that the draft framework fails to adequately promote integrated landscape management for native vegetation, particularly with respect to natural disturbances such as fire and the adoption of appropriate fire regimes for public safety and ecological resilience.

NAFI has consistently advocated to federal and state inquiries into bushfire matters that a more strategic and preventative landscape approach to fire risk management is needed to address planning inadequacies in fuel management and an alarming incidence of large scale high-intensity bushfires in south-eastern Australia, that can have significantly adverse impacts on a range of vegetation communities and dependant flora and fauna. Large scale 'mega-fires' not only destroy lives and property, they cause significant damage to biodiversity, watersheds and natural resource dependant industries such as agriculture and forestry.

Preventative land management through fuel reduction, vegetation thinning and related activities such as maintenance of access trails and fire breaks can have a beneficial impact in reducing the likelihood and severity of natural fires. It has been shown, for example, that hazard reduction by prescribed burning will reduce the rate of spread, flame height and intensity of a fore and reduce the potential for spotting[1]. However, the integrated use of fuel reduction measures across forest landscapes has been problematic for a number of reasons. These include:

- multiple land agencies and tenures with responsibilities for fire management;
- inadequate funding, skills and equipment;
- a focus on fire suppression at the expense of fire prevention;
- a decline in forestry trained fire managers and infrastructure from the transfer of multiple-use public forests to national parks and reserves; and
- a political and institutional environment that has fostered a passive approach to fuel management in conservation reserves and protected areas.

A key deficiency has been a policy shift to fire suppression at the expense of longer term fire prevention and active land management for fuel reduction that can reduce the risk of high intensity fires. This aspect of fire management has failed to be adopted as part of any real reform of current practice for large tracts of conserved forest, despite its general acceptance by the scientific community:

> Australian bushfire scientists and anthropologists generally agree that, before European settlement, Indigenous people carried out frequent, regular and wide-scale burning, especially in the drier forest types. The net result was a mosaic of burnt and unburnt patches that limited the extent and intensity of fire under severe weather conditions.[2]

The outcome of these management settings has been an increasing incidence of large scale high intensity fires in south-eastern Australia, which can have devastating impacts on endemic flora and fauna populations. It is highly questionable as to whether such 'passive' approaches to fire risk management are consistent with good public policy. Fuel reduction burning is essentially a management tool that can be used to improve broader ecosystem resilience and biodiversity protection by greatly reducing the risks of large scale high intensity fires.

These concerns have been raised by NAFI with respect to a number of recent inquiries related to bushfires and the adequacy (or inadequacy) of public land and conservation management policies for native vegetation (refer Attachment). These inquiries have included most recently the Senate Select Committee Inquiry into the Incidence and Severity of Bushfires in Australia (2009) and the Victorian Bushfires Royal Commission (2009).

[1] Gould, JS McCaw, WL Cheney, NP Ellis, PF Knight, IK & Sullivan, AL, 2007, Project Vesta - Fire in Dry Eucalypt Forest: Fuel structure, fuel dynamics and fire behaviour. Ensis-CSIRO, Canberra ACT, and Department of Environment and Conservation, Perth WA, November.

[2] Montreal Process Implementation Group for Australia (2008). *Australia's State of the Forest Report 2008*. Bureau of Rural Sciences, Canberra.

To address these issues, NAFI continues to advocate a strategic landscape approach to fire risk management that looks at the risks across all land tenures and develops appropriate zoning and fuel reduction strategies (see, for example, Stephens 2010)[3]. Such a strategic landscape approach is consistent with recommendations from the review in 2004 by the Council of Australian Governments (COAG), following the devastating 2003 fire season, to improve coordination and fuel management across all land tenures.

Numerous government inquiries and reviews have highlighted the inadequacy of prescribed burning activities and other planning impediments to fuel management in conservation reserves and other public lands (Parliament of New South Wales Legislative Assembly 2002; House of Representatives Select Committee on the Recent Australian Bushfires 2003; Environment and Natural Resources Committee 2008). Inadequacies in fuel management in one part of the landscape only increase the risk of high-intensity fires in other areas with adverse economic, social and environmental consequences.

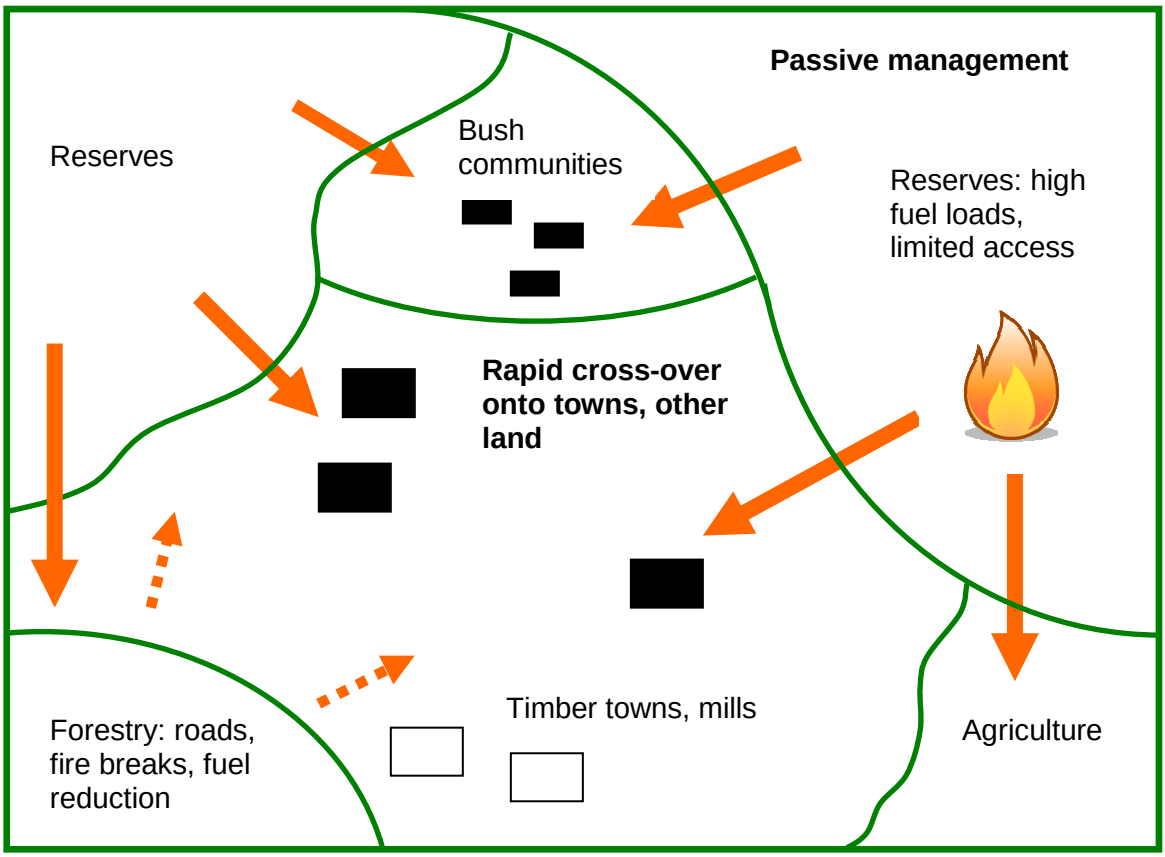
It is for these reasons that the draft framework for 'Australia's Native Vegetation Framework', in developing high level policy principles, should promote a strategic landscape approach to fire risk management, particularly with respect to inadequate fuel management practices and fire regimes in many protected areas. The current draft provides a somewhat cursory reference to fire regimes and fails to address landscape scale and multiple-jurisdictional issues that relate to better fire and vegetation land management.

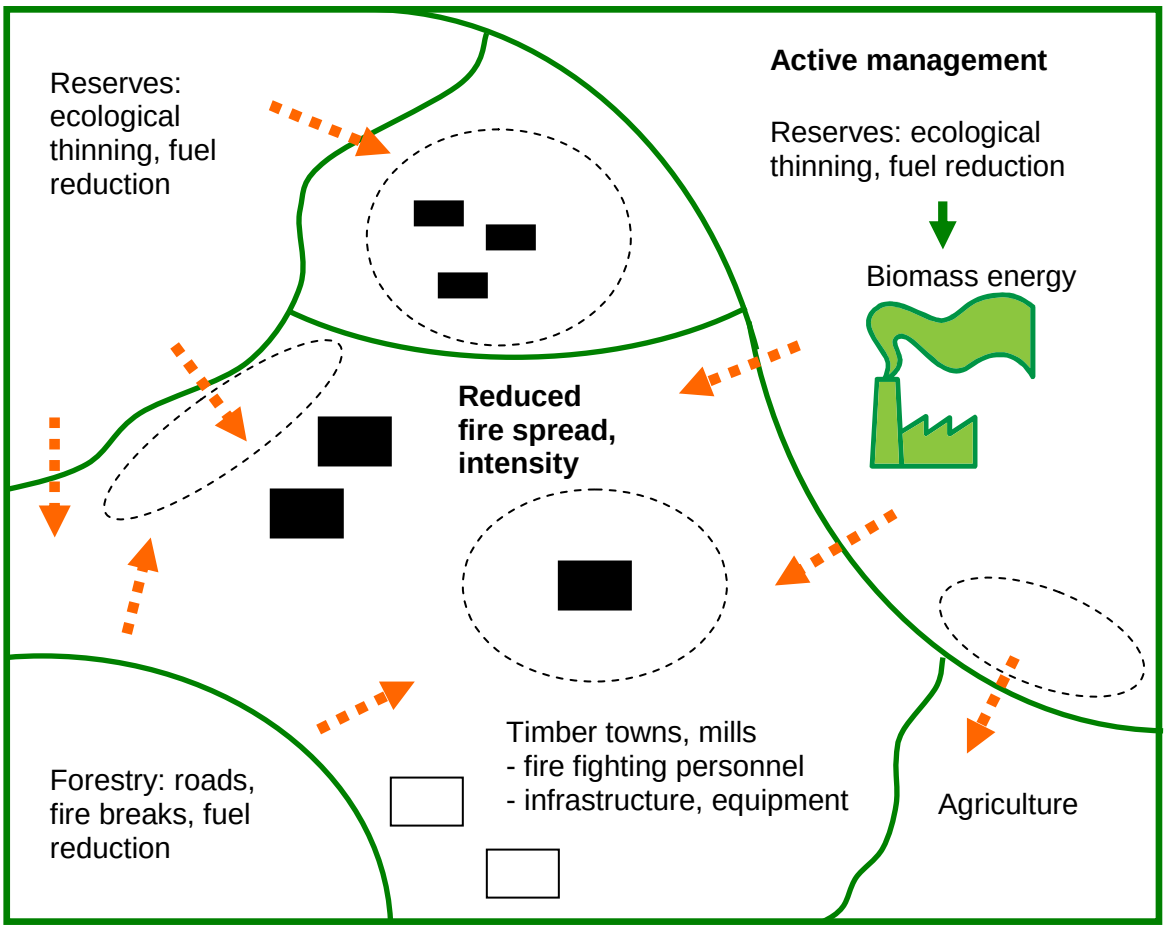
NAFI appreciates the opportunity to make a submission on the consultation draft and would be willing to expand on its submission by taking part in any further consultations.

Attachment: NAFI submission to the Senate Select Committee Inquiry into the Incidence and Severity of Bushfires in Australia (2009).

[3] Stephens M (2010). Bushfire, Forests and Land Management Policy Under a Changing Climate, *Farm Policy Journal*, 7 (1): 11-19.

Fire: a landscape risk management approach





Source: Stephens M and Hansard A (2010). National Association of Forest Industries. Supplementary submission to the Senate select committee inquiry into bushfires in Australia.