

Department of Sustainability & Environment,
Re: Fire Operations Plan,
574 Main Street,
BAIRNSDALE VIC 3875

RESPONSE BY GIPPSLAND ENVIRONMENT GROUP INC TO THE 2012-2015 FIRE OPERATIONS PLAN

Dear Sir/Madam,

- The Gippsland Environment Group is greatly concerned at the increase in areas to be burnt in 2012-2013 to 2014-2015. Historically there is no evidence of any forest burning program that is as intensive and destructive as the proposed plan.
- The proposed burns for this period ensures that the majority of public land in East Gippsland will have been burnt in the last 10 years.
- Gippsland Environment Group questions the large scale burning of remote areas, evidence suggests that this practice has very little effect in protecting communities. Following the Black Saturday fires research by Dr Phillip Gibbons (Senior fellow at the Fenner School of Environment and Society at the ANU) found that “Our research indicated that the proximity of Fuel Reduction burning to houses was more important than the total area of prescribed burning in the landscape.” “Clearing within 40 metres of houses was the most effective form of fuel reduction on Black Saturday.” The Independent Bushfires Royal Commission Implementation Monitor Neil Comrie has also recommended that “the planned burning program be strategically focused on addressing high risk areas, rather than on meeting the broader hectare burning target.”
- Gippsland Environment Group has continuing concerns for the survival of many species of flora and fauna on public land across East Gippsland especially areas fire affected in 2003 and again in 2006/07.
- Burns mentioned in the FOPS for 2012-2015 together with widespread clearfell logging will compromise species further. These ongoing disturbances will effect

recolonization and movement into fire affected areas. We believe many species could face extinction, already species are in decline.

- Gippsland Environment Group continues to emphasize the need for more monitoring of species, pre and post burning, to determine species status.

The Code of Practice for Fire Management on Public Land states:

3.6 Monitoring

“The Department must conduct or arrange soundly based samplings on an ongoing basis to monitor the effects on fuel levels, flora, fauna and other values as appropriate. Wherever possible this should include an assessment of pre and post burn conditions.”

“Areas chosen for monitoring flora and fauna must target and adequately address the range of species and/or vegetation types for which burning for fuel and other management purposes are planned over most of their distribution.”

- Widespread fuel reduction burns are earmarked for National Parks and reserves in Gippsland. These will compromise the values of these areas and why these parks were originally established.
- In previous burns most old habitat trees have been destroyed wiping out vulnerable species. Very little care is taken to prevent these from burning. A full scale monitoring program is urgently needed to assess the impact of burning these old growth trees.
- Gippsland Environment Group insists that those in charge of burns adhere to the rules governing Fuel Reduction Burns. In the Gippsland Fire Protection Plan which is still current it states very clearly on page 56 the vegetation types that should not burn
 - Rainforest and the vegetation within 100 metres of rainforest.
 - Riparian Forest – within 40 metres of a stream.
 - Snow gum woodlands.
 - Alpine grasslands and shrubland.
- The effect on tourism is greatly underestimated, thick smoke and large areas of blackened burnt country impacted greatly on the tourism experience in east Gippsland.
- The fires are still far too hot for fuel reduction burns. They are destroying the areas these fires are designed to save. There is a high incidence of canopy burn.
- We ask that the DSE provide documentation and a detailed explanation of the Land Management objectives for the ecological burns listed below:-
 - 2BBB0030 Tabberabbera – Horse shoe bend
 - 2BBB0038 Tambo – Playgrounds

2BBB0031	Waterholes – Archies Rd
2BBB0032	Waterholes – Dinghy Creek
2BBB0033	Waterholes – Nicholson Creek Track
2BBB0045	Bruthen Pound – Yard
2BBB0046	Deptford Farm Store Creek
2BBB0047	Deptford – Nicholson Creek Link
2BBB0048	Fairy Dell – Wards Rd
2BBB0049	Marthavale – Friday Spur
2BBB0051	Waterholes – Stockyard Track
2BNN0045	Buchan Green Hills
2BNN0013	Buchan Quire Station
2BBB0009	Mitchell River Nation Park – Hortons
2BBB0022	Bullumwaal German Gully Rd

- What measures are the DSE implementing to counteract the effect of pest species such as sambar deer, hog deer and feral pigs on the regeneration of species post fire?
- The smoke generated from 2012-2015 fuel reduction burns will pose a serious health risk to communities in Gippsland. Has the DSE approached the EPA to monitor smoke during these proposed burns? Will measures be taken by DSE to put out smoldering fires which they have not done in the past?
- An issue which cannot be ignored these days is the production of CO₂. The loss of stored carbon from all areas of native forest in Victoria is occurring as a result of DSE's fuel reduction burning. In the past forest carbon levels have been greatly reduced by wildfires.
- Fuel reduction burning promotes a false sense of security it implies that a community will be safe from fire.
- Fuel reduction burns also take the responsibility of bushfire prevention away from individuals; Gippsland Environment Group feels that individual responsibility should be encouraged with ongoing assessment of fire readiness for individual properties.
- The regeneration of thick young eucalypt forest post clearfell logging poses an enormous threat to surrounding communities in the foothills of Gippsland. Will management of these coupes be changed to lessen the fire threat from these areas? Why are these not seen to be a fire threat with fuel loads far greater than the natural forest?
- The establishment of pine and blue gum plantations in Gippsland poses an enormous threat to communities. Why are these also not seen as more of a threat than native forests?

In previous responses to the Fire Operations Plan Gippsland Environment Group was given assurances by certain DSE personnel that areas of special significance were not to be burnt. We now find these areas are included in the Fire Operations Plan for 2012-2015. Gippsland Environment Group requests a meeting to discuss with DSE and Parks personnel, this issue and other concerns we have.

Yours faithfully,

A black rectangular redaction box covering the signature of the sender.

Gippsland Environment Group Inc,
31 August, 2012.