



The Hon Lily D'Ambrosio
Minister for Environment, Energy and Climate Change
Level 17, 8 Nicholson St
East Melbourne
Victoria 3002
By email: lily.d'ambrosio@parliament.vic.gov.au

Re: urgent request to pause and review planned burns in Gippsland and East Gippsland

Dear Minister,

Gippsland Environment Group Inc (GEG) respectfully requests you intervene immediately to pause and review planned burns in Gippsland and East Gippsland this autumn.

1. Gippsland and East Gippsland regions have experienced severe drought for the past two years, ecosystems are under incredible stress. Vast areas of the region (almost 200,000 ha) have been burnt in bushfires over the spring and summer of 2018-19. A recent Wilderness Society report (*Abandoned – Australia's forest wildlife in crisis*) highlighted the abysmal failure of DELWP to protect nationally threatened species. Two dozen forest fauna species are now listed under the EPBC Act as 'endangered' or 'critically endangered', a further 15 species have been listed as threatened for the first time. Additional fire in the landscape from planned burns will exacerbate the pressure leading to forest ecosystem collapse.
2. We recommend that an independent review is undertaken of the extensive bushfires that occurred in Gippsland and East Gippsland over the spring and summer. Many of the bushfires burnt through areas that had already been burnt by significant fuel reduction burns or major bushfires in past decade. Scientific studies indicate that long unburned forest is less flammable and that frequent planned burns can actually increase the risk of bushfire yet it would appear that the science is not being integrated into government policy nor informing regional DELWP/FFMV actions.
3. DELWP planned burns are contributing to the decline of native flora and fauna in contravention of the department's own objective as detailed in the *Gippsland Strategic Management Plan 2018*. Our group is deeply concerned by DELWP's failure to undertake comprehensive pre-burn surveys and modify burn plans to protect threatened species accordingly. There is a serious lack of biodiversity staff. DELWP on ground pre-burn surveys are virtually non-existent or only occur along easily

accessible roadsides. When GEG provided DELWP staff with threatened species data from our own pre-burn surveys, little or no modification of burn plans occurred. Hollow bearing roadside trees which are often the last remaining critical den habitat in logged forest areas for gliders, owls and other arboreal species are felled without any biodiversity assessment; long unburned forest areas which are a refuge for ground dwelling species such as bandicoots and potoroos are not excluded from planned burns, long unburned areas are now extremely rare; grassland remnant areas along rail-lines and roadsides are burnt with almost 100% coverage leaving no mosaic refuge areas; grasslands containing threatened orchids and other species are burnt outside of the critical time as determined by action statement recommendations; large forest owl exclusion zones are minimal and their extensive feeding territories are completely destroyed; Giant Burrowing Frog exclusion zones are not complied with and ephemeral streams are not surveyed pre-burn; Rainforest exclusion zones are not complied with, DELWP/FFMV continue to rely on the fuel moisture differential which is totally unacceptable and unreliable due to the impact of climate change; DELWP/FFMV obsession with burning ribbon bark and stringybark trunks results in hotter and hotter burns causing the loss of many hollow bearing trees.

4. Within the huge areas burnt by bushfire throughout Gippsland and East Gippsland this summer (including national parks) DELWP continue to back-burn for weeks or months and deliberately eliminate many of the last unburnt refuges. This practise is completely unacceptable and contrary to the protection and survival of biodiversity.
5. Will the approximately 200,000 ha area in Gippsland and East Gippsland burnt in the summer 2018-19 bushfires be counted towards the planned burn target for this autumn?

Gippsland Environment Group would welcome the opportunity to discuss these matters with you at your earliest possible convenience.

We look forward to receiving your response.

Yours sincerely
John Hermans
President
Gippsland Environment Group
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8th April 2019