

**AN INITIAL SUBMISSION TO
THE 2009 VICTORIAN
BUSHFIRES ROYAL
COMMISSION**

by the

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Australia (Victoria) Inc.**

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EXECUTIVE SUMMARY

The Sporting Shooters Association of Australia (Vic) Inc. is the premier body representing Australia's recreational hunters. In Victoria, we have 25,000 members scattered throughout metropolitan, regional and rural areas.

We believe that at least 10,000 of our members live in close proximity to Victoria's forests or other fire-prone areas. We believe this represents the largest organised body of bush-users in Victoria. As such we are well versed about the management of the state's forests and how this has contributed to the 2009 bushfire disaster.

In our view there is both short term and long term components of the 2009 fires:

- The **short term component** includes the current drought, the extreme weather conditions (particularly on 7th February), and the sources of ignition. To a large degree these matters were not controllable.
- The **long term components** are factors that have been conspiring for decades to fuel a bushfire disaster of the magnitude of 'Black Saturday'. These factors are largely controllable and include:
 - The disproportionately heavy political weight accorded to 'green' ideologues over several decades which has progressively changed the land management priorities of government agencies and significantly reduced their capacity to conduct effective fire prevention activities such as fuel reduction burning, the maintenance of the access road and track network.
 - The expansion of residential housing into fire-prone rural and semi-rural areas on the urban fringe which has increased the difficulty of fire prevention and suppression.

Further to this, successive Victorian governments have failed to take the advice of forest management specialists in relation to matters such as fire prevention where it conflicted with politically expedient policies attractive to 'green' voters. A similar marginalisation of practical knowledge in favour of 'green' policies has also been noted at local government level, particularly in areas around the urban fringe.

We believe the Black Saturday fires provide an urgent imperative for change and present the following recommendations for your consideration.

SUMMARY OF RECOMMENDATIONS

Circumstances and causes

- **Increase resources to state government agencies charged with managing public forests**
- **Do more fuel reduction burning**
- **Consider the re-introduction of controlled grazing as a fuel management tool**
- **Change the political paradigm which currently views forest management issues as ‘political footballs’ for garnering the ‘green’ vote. Instead they must be treated as serious issues with potential to have huge impacts on the community**
- **Take far less notice of the ‘green’ lobby who have a long history of publicly misrepresenting forestry issues in order to achieve ideological outcomes**

Preparation and planning

- **Overhaul Local Government regulations pertaining to the management and control of vegetation on private land to reflect the reality of life in fire-prone areas**
- **Reconsider retention and management of roadside vegetation in fire-prone areas**
- **Develop a network of safe refuges to protect residents in bushfire emergencies**

Response to bushfires

- **Review the current pre-occupation with OH & S in fire suppression with regard to the reality that the greatest risk is missing the best opportunities for fire control and thereby allowing fires to burn for longer**
- **If there are government policies deliberately restricting the ability of suppression forces to directly attack fires at night, they should be reviewed in the interests of being able to contain and control fires sooner with far less area being burnt, and consequently less damage to environmental values**
- **Review the current policy of centrally-controlling bushfire suppression operations which is constraining the capability of on-ground personnel to most effectively attack bushfires at the most opportune times.**

Minimising disruption to essential services

- **Instigate a program to bury transmission lines underground in fire-prone regions**

Other matters

- **Urgently consider and then implement some form of recompense for CFA volunteers in order to maintain the capacity to attract and retain them given their increased importance in forest fire-fighting**
- **Ensure that post-fire animal welfare policies are extended to all burnt areas so that suffering amongst injured wildlife or domestic animals is not unnecessarily prolonged.**

Public communication and community advice

- **Investigate the potential to develop a standard fire danger rating threshold to complement the ‘stay or go’ policy. This could be based on an appropriate Fire Danger Index (FDI) beyond which residents would be compelled to leave. This would take the decision out of the hands of those residents who are ill-informed or poorly prepared to stay and defend their properties under particularly dangerous conditions.**

INTRODUCTION

SPORTING SHOOTERS ASSOCIATION OF AUSTRALIA (VIC) INC.

Since its inception in 1973, the Sporting Shooters Association of Australia Inc (SSAA) has been the premier body representing Victoria's licensed firearm owners. Currently, SSAA (Vic) Inc has 25,000 members represented by 17 branches scattered throughout metropolitan and regional areas.

We estimate that at least 10,000 SSAA members live in close proximity to Victorian forests or in other fire prone areas. In addition, many of our members work in forests and/or are volunteers with the Country Fire Authority and thereby have particularly useful insights into these matters.

THE BASIS FOR OUR CONTRIBUTION

SSAA (Vic) Inc arguably represents the largest organised group of recreational bush-users in the state, and certainly in State forests where hunting is routinely permitted. Some hunting is also permitted in limited areas within four Victorian National Parks. Our members are also engaged in partnership with several government agencies in pest animal control in various public land tenures, as well as on private lands.

By its nature, recreational hunting and pest animal control is conducted throughout the landscape, including some of its most remote areas. This distinguishes it from most other recreational bush-users whose activities are limited to drivable roads/tracks and designated (and usually constructed) walking trails.

The sheer number of SSAA members and their regular movements throughout Victoria's forested country has enabled the Association to develop valuable insights into matters that have a profound influence on the capability of the relevant government agencies to effectively manage bushfire. These include:

- the maintenance of forest roads and tracks, including bridges and other drainage infrastructure;
- the extent and effectiveness of forest fuel management; and
- apparent changes in how these matters have been addressed over the past several decades.

In addition, with so many members who reside in country Victoria, the SSAA has insights into relevant changes to the public lands bureaucracy and its fire-fighting arm, as well as the role and operation of the Country Fire Authority.

THIS SUBMISSION

This submission makes a range of general observations and then addresses the relevant Terms of Reference defined by the Royal Commission.

GENERAL CONCERNS

SSAA (Vic) Inc has long been concerned about the direction of public land management in Victoria. In particular, the huge transference of former multiple use State Forests into the parks and reserves estate which has obviously reduced the opportunities for hunting.

While we are supportive of the need to adequately conserve biodiversity, the shift away from multiple use forest management has in our view been counter-productive in this regard largely because of implications relating to the management of fire.

CHANGES TO PUBLIC LAND TENURE

In the 18 years from 1988 to 2006, the area of nature conservation reserves (including national parks) in Victoria increased from 1.83 million hectares¹ to 3.75 million hectares.² This represents a 105% increase.

In the context of forests, in the decade from 1998 to 2008, the area of forested national parks and other nature conservation reserves in Victoria has increased by 800,000 hectares from 2.71 million hectares³ to 3.51 million hectares.⁴

Around 52% of Victoria's forested public land is now being managed primarily for conservation purposes, whereas in the past by far the greatest proportion was being managed for multiple uses and values. This included economic activities such as timber production, apiary, and grazing which entailed people working throughout the forest.

These activities still persist today but are far less significant. For example, the area of forest available for timber production has fallen by two thirds since 1986 as State Forests have progressively been transferred into the parks and reserves estate.⁵ Grazing has now been virtually eliminated from public lands after decisions in recent years regarding high country grazing and the red gum forests on the Murray River flood plain. Honey bees are still permitted in many areas but have been removed from some national parks.

¹ *Striking a Balance!: Australia's Development & Conservation*, Core Material for Earth Studies, Australian Bureau of Statistics, Commonwealth of Australia (1992) – Table 5.27 (p. 220).

² *Conserving Australia: Australia's national parks, conservation reserves, and marine protected areas*, Senate Inquiry by the Environment, Communications, Information Technology, and the Arts Committee, Parliament of Australia (April 2007) – Chapter 3, Table 3.1

³ *Australia's State of the Forests Report 1998*, National Forest Inventory, Bureau of Rural Sciences, Commonwealth of Australia (1998) – Table 5 (p. 36)

⁴ *Australia's State of the Forests Report 2008*, Bureau of Rural Sciences, Department of Agriculture, Fisheries and Forestry, Australian Government (2008) – Table 6 (p. 10)

⁵ This is based on a comparison with current Department of Sustainability & Environment figures showing that about 9% of Victoria's forests are now available and suitable for sustainable timber production, whereas the Department of Conservation, Forests and Lands 1986 Timber Industry Strategy estimated that 31% of forests were available and suitable for this purpose.

ACCOMPANYING CHANGE TO MANAGEMENT CULTURE

Changes to public land tenure in Victoria (and indeed around Australia) have typically been accompanied by a cultural shift in management emphasis away from landscape-scale concerns to a far narrower focus on tourism and recreational activities which are generally restricted to just minor parts of the landscape.

For example, while the Kosciusko National Park in NSW attracts well over 1 million visitors per year, their activities are overwhelmingly restricted to within just a 1% portion of the park area. Naturally, park management funding and activity is focussed on controlling these visitors and their impacts in this portion, whereas the remaining 99% of the park is largely neglected.⁶

In contrast to this, managing forests in which there are scattered economic activities requires a landscape-wide focus. A large part of this entails maintaining access and protecting resources, particularly against fire. Accordingly, the management of multiple use State Forests has typically been driven by an economic imperative to keep roads and tracks in good condition, and conduct activities such as fuel reduction burning which can mitigate the intensity of wildfire, thereby making it easier to control and minimising its damage.

The wholesale changing of land tenure and attendant removal of economic activities from so much of Victoria's public forest estate has now significantly reduced this imperative. It has also taken land management responsibilities out of the hands of foresters who had a typically interventionist approach, and placed it in the hands of park managers who, as a group, generally prefer a more 'hands-off' approach founded on the sanctity of the bush and a desire to keep it in an undisturbed state. This approach is typified by a lower enthusiasm for fuel reduction burning which deliberately disturbs the bush although essentially for its own good. We also believe that any willingness to actively manage forest fuels in parks and reserves is constrained by scarce funds and resources more focussed on visitor management.

Whilst the devastation that occurred on 'Black Saturday' cannot be totally explained by the build-up of fuels in forested parks and conservation reserves, it is a critically important factor that was arguably more relevant to the previous massive fires of 2003 and 2006/07 which occurred in more remote areas of which the majority was conservation reserve.

Nevertheless, we view the Royal Commission as an opportunity to redress the now problematic land management culture which is ultimately having a catastrophic impact on our environment and will also periodically impact on human life and property as it did on February 7th 2009.

⁶ *The Uses and Values of National Parks: Does More Mean Worse?*, by Jim Hoggett, Institute of Public Affairs Backgrounder, Vol 17/2 (May 2005)

HISTORICAL CONCERN FOR PUBLIC LAND MANAGEMENT

The SSAA's concerns about public land management date back almost 20 years to the start of the period of accelerated change to public land tenure that was arguably initiated by the declaration of the Alpine National Park.

As part of submissions by the Shooting Sports Council of Victoria Inc, the SSAA at that time expressed the following concerns about proposals to manage the Alpine National Park and the associated Wilderness Area:

'Submission and Proposed Amendments to the LCC Alpine National Park Management Plan Proposals', by SSCV, April 1990

"Forests where the floor litter is exceedingly high in weight per hectare, are over-abundant throughout the (Alpine) park, and we consider that it would be most appropriate to undertake fuel reduction burning in some areas as a matter of high priority."

"We are concerned that there is insufficient emphasis here on fuel reduction burning and generally concerned that if this is not carried out, totally uncontrollable wildfires will sooner or later result."

"..... there are an excessive number of road closures proposed here and we believe they should not proceed. if roads are closed permanently to all vehicular traffic, there will be serious problems created for those needing to fight fires and this is highly undesirable."

'Comment on Proposed LCC Wilderness Recommendations' by SSCV, April 1991

"In the current climate of extremely limited resources, the likelihood of adequate management seems extremely remote (particularly given current achievements) and the wisdom of proceeding under these circumstances should be seriously questioned."

"Management intent regarding fuel reduction is unclear in Wilderness. However we regard efforts to date in the Alpine Park to have been quite inadequate. The prospect for 'hot burn' wildfires of uncontrollable ferocity grows yearly, yet little effective action has occurred. We would hope (but unfortunately are not confident) that this situation will improve, but if it does not, the prospect for major destruction by fire, of the Alpine Park and Wilderness is increasingly real."

"A very essential reason for retention of tracks is fire-fighting and other emergency access. We believe that all tracks should be retained in their existing condition, maintained to the present standard with no upgrading nor down-grading. This comment applies to all wilderness areas."

Unfortunately, some of these concerns have already proven to be chillingly prophetic. They remain as valid now as they were then.

RESPONSE TO THE ROYAL COMMISSION'S TERMS OF REFERENCE

The following responses to the Royal Commission's Terms of Reference are based on the sentiments of our members, particularly those 8,000+ members who reside in rural and regional areas who have particular exposure to bushfires and how they are managed both in terms of prevention and suppression.

TOR No. 1: CAUSES AND CIRCUMSTANCES OF THE BUSHFIRES

There are both short term and long term components that need to be acknowledged here.

Undoubtedly, the 2009 fires have been overwhelmingly influenced by entrenched below average rainfall that has prevailed across Victoria for 12 years, coupled with extreme weather conditions (particularly on February 7th), and unexpected sources of ignition at the most inappropriate times – including (it seems) a spate or arsonist activity.

These factors, together with the locations of fires in close proximity to the moderately populated urban-rural interface have proven to be a lethal combination of circumstances against which arguably little could be done at its height on the afternoon and evening of February 7th.

However, we contend that a range of contributory factors have been conspiring over a long period to make such as disaster inevitable after 'near misses' in 2003 and 2006/07 when fires of similar intensity fortunately occurred in more remote, less populous regions, but nevertheless exerted an equivalent level of devastation on environmental values. These long term contributory factors include:

- **The build-up of forest fuels on public lands after two decades of inadequate fuel reduction burning.** It is well known that the Department of Sustainability & Environment have generally failed to meet annual fuel reduced area targets for many years. It is not so well known that the annual target area of around 130,000 ha is a magnitude of 2 to 3 times lower than the area that was being routinely fuel reduced 25 – 30 years ago.⁷
- **The environmental ('green') lobby** – in particular groups such as the Wilderness Society, the Victorian National Parks Association, and the Australian Conservation Foundation who have campaigned incessantly for ideological causes with no understanding and/or regard for their potential to perversely influence the capability to effectively manage forest fire on public lands.

⁷*The Facts Behind the Fire: A scientific and technical review of the circumstances surrounding the 2003 Victorian bushfire crisis*, by Barrie Dexter and Athol Hodgson, Forest Fire Victoria (April 2005). Can be viewed at <http://home.vicnet.net.au/~frstfire/>

Whereas for the most part their efforts have been directly focussed on timber production and, to a lesser extent, grazing, there have increasingly been instances of direct and active opposition to plans to conduct fuel reduction burning, especially in close proximity to residential developments where it is an essential component of minimising risks to human life and property.

- **Victorian governments** for regularly acquiescing to the demands of the ‘green’ lobby over a long period. The frequency with which this has occurred via commitments made during recent state election campaigns has been particularly insulting to those whose lives and livelihoods have been adversely affected by decisions involving resource-use.

Including and since 2002, the Victorian government has announced major commitments to change the management of the Otways, the Goolengook forest, the Wombat forest, and the Murray River red gum forests during state election campaigns.

In the case of the Goolengook and Red Gum forests, these announcements effectively pre-empted the outcomes of partly-completed investigations by the government’s own Victorian Environmental Assessment Council which was endeavouring to objectively determine the future management of these forests.

This suggests that the government has been far more interested in political point-scoring than making rational decisions about managing public lands that take full account of community and environmental concerns. For this it deserves to be held accountable.

- **Victorian governments** for failing act on expert advice on the need to increase the level of management of forest fuels. The most recent recommendation to triple the area of fuel reduction burning made by a Parliamentary Committee of inquiry into public land management, was rejected by the government only last December.⁸ Interestingly, since the Black Saturday fires the government has committed an additional \$50 million for fuel reduction burning over the next five years.
- **Victorian governments** for failing to adequately resource public land management to a level that would maximise its capability to manage fire, particularly in the burgeoning area of parks and reserves where the management agency Parks Victoria reportedly has only minimal funding beyond what is necessary to pay personnel wages and run vehicles. An anecdotal example of the significance of this was that Parks Victoria was dismayed when the government announced five new national parks in the Murray River red gum forests, when it believed it was only capable of managing the new Barmah National Park. Lack of adequate resourcing is a primary reason for low levels of fuel reduction burning, and declining maintenance of forest access roads/tracks.

⁸ *Impact of Public Land Management Practices on Bushfires in Victoria*, report of inquiry by the Environment and Natural Resources Committee, Parliament of Victoria (June 2008). The Government responded to its recommendations on 4th December 2008. Can be viewed at www.parliament.vic.gov.au/enrc/inquiries

- **The expansion of residential development into fire-prone semi-rural and bush areas on the outskirts of Melbourne.** This has had implications both on the capability to conduct fuel reduction burning, and on fire suppression activities which become far more problematic when the protection of human life and property become factors that have to be considered.
- **Changing rural demographics.** The changing demographics of rural areas is a complex issue related to the loss of traditional rural industries, the amalgamation of farms, the rise of agribusiness investments, lack of social opportunities for new generations of landowners, and the rise of the tree change phenomena that has seen the relocation of city residents into some attractive rural and coastal regions.

With regard to bushfire management on public land, the loss or decline of the native timber industry from significant parts of Victoria has reduced the availability of experienced personnel and machine operators (and their equipment) during bushfire crises.

On private land, the loss of traditional rural industries and generally declining employment opportunities is affecting the availability and calibre of Country Fire Authority volunteers. Arguably, this is far more serious in more remote regions than those affected by the 2009 bushfires. However, while there may be no shortage of willing volunteers in these more urbanised regions closer to the urban fringe, many are unfamiliar with country life and unaware of basic practical tenets. An anecdotal recent example was a CFA volunteer who endeavoured to cut a wire farm fence with a chainsaw.

Recommendations: TOR No 1

- **Increase resources to state government agencies charged with managing public forests**
- **Do more fuel reduction burning**
- **Reconsider the use of grazing as a fuel management tool**
- **Change the political paradigm which currently views forest management issues as ‘political footballs’ for garnering the ‘green’ vote. Instead they must be treated as serious issues with potential to have huge impacts on the community**
- **Take far less notice of the ‘green’ lobby who have a long history of publicly misrepresenting forestry issues in order to achieve ideological outcomes**

TOR No. 2: PREPARATION AND PLANNING

With regard to public lands, many of the factors discussed under TOR No.1 (above) are highly relevant to the preparation and planning undertaken prior to the 2009 fire season. On private lands and public reserves and roadsides managed by Local Government, effective preparation and planning is far more a reliant on activities undertaken immediately prior to each fire season. We put forward the following areas of concern:

- **The general failure of responsible Local Government authorities to appropriately control roadside vegetation.**
- **General failure of Local Government and State Government agencies to adequately control noxious weed infestations.**
- **Impractical Local Government vegetation controls on private land.** These include:
 - Restrictions on vegetation removal/control
 - Excessive re-vegetation demands

The enforcement of regulations governing vegetation management are viewed as a major impediment to the capability of landowners to effectively prepare their properties to withstand bushfires, particular where restrictions apply to clearing vegetation in close proximity to houses. It is expected that the Royal Commission will receive many submissions about this issue and we reiterate this concern.

- **The failure of Local Government in bushfire-prone areas to provide ‘safe havens’ or refuges** specifically to protect residents during bushfire emergencies such as ‘Black Saturday’.

Recommendations: TOR No 2

- **Overhaul Local Government regulations pertaining to the management and control of vegetation on private land to reflect the reality of life in fire-prone areas**
- **Reconsider retention and management of roadside vegetation in fire-prone areas**
- **Develop a network of safe refuges to protect residents in bushfire emergencies**

TOR No. 3: **ASPECTS OF THE CONTROL RESPONSE TO THE 2009 BUSHFIRES**

Again, many of the factors mentioned under TOR No.1 have relevance to the efforts expended in trying to control the 2009 bushfires and to protect life and property. Other factors of concern particularly noted by SSAA members who were closely involved with these fires include:

- **An apparent reluctance of fire suppression forces to fully utilise the best opportunities to control fire.** This is evident in a reluctance to actively and directly attack fires at night – instead preferring to simply patrol them. In reality, this may vary according to circumstances relevant to the particular fire, but in relation to the Bunyip State Park fire, it was stated clearly at a community briefing in Gembrook that no attempts would be made to contain the edge of the fire at night despite 25 personnel being despatched presumably to just watch it.⁹ Presumably this is a response to operational health and safety requirements that seem to now take precedence over and compromise effective fire suppression.
- **There is an apparent lack of on-site initiative in fire suppression efforts.** It seems that the on-ground response to fire is overly governed by remote management from central headquarters which can delay decisions, frustrate those in the field, and lead to opportunities being missed to gain ground against going fires. Just one example, was the inability of on-site fire-fighters to make crucial decisions about fires threatening Melbourne’s catchments. This is understandably a sensitive issue, but having to defer decisions about control line construction and backburning to a central coordination centre constrains the efforts of those trying to minimise the damage.
- **There is an apparent pre-occupation with indirect fire control strategies that consign huge areas of forest to being burnt in backburns that can take weeks to complete.** Again the veracity of this point probably varies between fires and their circumstances. However, it seems that the traditional method of direct attack by constructing trafficable control lines on the fire edge has been replaced by a strategy of pulling back to major roads and conducting huge back burning operations that rely on favourable weather conditions for up to several weeks before they can be declared safe. It is unclear whether this strategy is favoured because of OH & S concerns or because there is now such a reliance on CFA volunteers who are far more comfortable fighting fires from major roads than from rough dozer trail control lines in the heart of the bush.
- **There is a large level of inexperience amongst the on-ground DSE fire suppression forces.** The most experienced, older personnel are invariably back at headquarters involved in planning and managing roles when their experience is

⁹ Personal recollections, Mr Colin Wood, Manager, Hunting and Conservation, Sporting Shooters Association of Australia, and Gembrook resident who attended a community briefing on the Bunyip State Park fire on the 9th February 2009.

solely needed at the fire front. This may be related to the fact that so many of the DSE personnel, particularly those involved in managing the majority area now occupied by parks and reserves, do not have forest science training or operational forestry backgrounds. Formerly, experience in controlling fire was routinely gained by foresters involved in post-logging regeneration burning and fuel reduction burning. With far less of this now being done over much of the state (eg. there is now no timber production west of the Hume Hwy) it is presumably more difficult for personnel to gain this experience except during wildfire emergencies.

It is also understood that the magnitude of recent fire seasons has initiated significant staff turnover due to the twin realities of hard, dangerous work and loss of lifestyle amenity – so, apparently many of those who gain valuable experience are soon lost to other parts of the bureaucracy less involved with fire.

Another factor could be the widespread embrace of contracting services for road maintenance, which has long since seen the responsible government land management agencies divest themselves of plant and AWU personnel. This has removed the need for government personnel to plan and supervise men and machines on-the-ground as part of their day-to-day work, which would further build their experience and confidence to manage on-ground fire control operations.

Recommendations: TOR No.3

- **Review the current pre-occupation with OH & S in fire suppression with regard to the reality that the greatest risk is missing the best opportunities for fire control and thereby allowing fires to burn for longer**
- **If there are government policies deliberately restricting the ability of suppression forces to directly attack fires at night, they should be reviewed in the interests of being able to contain and control fires sooner with far less area being burnt, and consequently less damage to environmental values**
- **Review the current policy of centrally-controlling bushfire suppression operations which is constraining the capability of on-ground personnel to most effectively attack bushfires at the most opportune times.**

TOR No. 4:

MEASURES TO ADDRESS POTENTIAL DISRUPTIONS TO ESSENTIAL SERVICES (eg. WATER, POWER)

The major point to make here is that, as many of our members will attest, in too many cases power transmission lines are too close to vegetation in forested areas which virtually consigns rural residents to regular disruptions to service and enhances the prospects of fires being ignited under extreme conditions such as those experienced on 'Black Saturday'. It is noted that at least one of the major fires on that day was thought to have been ignited by a damaged powerline.

Recommendation: TOR No.4

- **Instigate a program to bury transmission lines underground in fire-prone regions**

TOR 5: ANY OTHER APPROPRIATE MATTERS

The following comments are derived from SSAA members who are involved in some capacity with the Country Fire Authority (the CFA):

- **Ability of the CFA to attract and retain volunteer firefighters.** It is a concern that the future ability of the CFA to attract and retain volunteers will be compromised by what appears to be an increasingly regular requirement for them to spend weeks away from home and employment in unpaid attendance at forest fires located up to hundreds of kilometres from the communities and districts that they are ostensibly assigned to protect.
- **The increasing ‘hero worship’ of CFA volunteers in the media.** It is understood that CFA volunteers deserve public kudos for their selfless sacrifice of time and effort. However this has now reached alarming proportions in a media hungry for human interest stories to the point where the public-at-large could be excused for believing that the CFA is responsible for forest fires when in reality these are controlled and managed by government agencies.

This may not seem such a bad thing on the surface except that it may be influencing the motivation of some people to join the CFA. Arguably, those who are motivated to join for public adulation rather than community service are there for the wrong reasons. This may be being reflected in current allegations of arson as a cause in some of the 2009 bushfires and investigations which often point to the involvement of CFA members.

- **Over-emphasis on risk aversion in accordance with OH & S requirements during fire suppression operations.** This has been partially dealt with in discussion already under TOR No. 3. Further to this earlier discussion, it is clear that the CFA as well as the government agencies, has allowed OH & S considerations to drive their fire-fighting response. CFA volunteers now quite openly admit that they are trained to firstly guarantee their own safety, with extinguishing the fire being only a secondary consideration.¹⁰

On the surface this is quite reasonable as fire-fighters are obviously of no use if dead or damaged, notwithstanding the potentially huge loss to their families and the community if their safety is compromised. The difficulty lies with the point at which fire-fighters consider that a reasonable and controllable risk becomes an unacceptable one. Clearly it seems that at present, there are too many instances where risk assessment is unreasonably skewed in ways that are constraining fire suppression operations under conditions when good work could be done (and certainly would have been in the past) with minimal risk.

There is realistically probably little that can be done except hope that as fire-fighters gain more experience they are better able to differentiate between reasonable and unreasonable risk.

¹⁰ *Eye of the Storm*, ABC Four Corners episode, 3rd May 2009. Can be viewed at www.abc.net.au/4corners/

- **Post-fire euthanasiation of injured wildlife and stock.** We assisted the responsible government agencies with this after the 2009 Black Saturday fires and support it wholeheartedly. However, there is a need to extend it to all burnt areas as a only a relatively small part of the burnt area was treated on this occasion.

Recommendation: TOR No.5

- **Urgently consider and then implement some form of recompense for CFA volunteers in order to maintain the capacity to attract and retain them given their increased importance in forest fire-fighting**
- **Ensure that post-fire animal welfare policies are extended to all burnt areas so that suffering amongst injured wildlife or domestic animals is not unnecessarily prolonged.**

TOR No.6

PREPARATION AND PLANNING FOR FUTURE BUSHFIRE THREATS

Many of the points already discussed under TOR Nos. 1 & 2 are relevant to preparing and planning for future bushfire threats.

TOR No.7 – LAND USE PLANNING AND MANAGEMENT

Many of the points already discussed under TOR Nos. 1 & 2 are relevant to preparing and planning for future bushfire threats.

However, we strongly reiterate our earlier point, that far less credence and influence should be accorded to the views of environmental activism than is currently the case when Victorian land management policies are being refined or altered.

The ‘green’ lobby are notoriously one-dimensional in their pursuit of ideological outcomes and have shown no propensity in the past to give fire the respect it deserves as our greatest environmental threat. Their silence since the 2009 fires has been deafening, and whilst we would like to think this reflects a realisation of past oversights, it is far more likely that they are simply tweaking campaign strategies that will continue as before once the current furore about their over-influence on declining standards of public land management dies down.

TOR No.8 THE FIRE-PROOFING OF HOUSES AND OTHER BUILDINGS

Our only comment here is that we would not generally support any moves to develop standard prescriptions for house construction based on fire-safety requirements.

TOR No.9 THE EMERGENCY RESPONSES TO BUSHFIRES

Some of the points already discussed under TOR No. 3 are relevant to future emergency responses to bushfire threats.

TOR No.10

PUBLIC COMMUNICATION AND COMMUNITY ADVICE SYSTEMS AND STRATEGIES

However an additional matter is appropriateness of the ‘stay or go’ policy which will certainly be strongly explored by the Royal Commission. We believe, as is being reiterated in the early hearings of the Royal Commission, that too many landowners do not understand the ‘stay or go’ policy or the dangers of fire, and so are consequently incapable of making reasoned decisions in regard to fire. It is likely that this will always be the case given human nature, and regardless of public education efforts which have already been quite extensive. For this reason we believe it may be pertinent to introduce a standard based on predicted ‘Fire Danger Index’ above which residents in threatened areas must be compelled to go.

Recommendation: TOR No.10

- **Investigate the potential to develop a standard fire danger rating to complement the ‘stay or go’ policy. This could be based on an appropriate Fire Danger Index (FDI). If the fire danger on any day is predicted to exceed this standard FDI, residents would be compelled to go. This would take the decision out of the hands of residents who are ill-informed or poorly prepared to stay and defend their properties under particularly dangerous conditions.**