COMMONWEALTH OF AUSTRALIA

HOUSE OF REPRESENTATIVES

BUSHFIRE REVIEW

BUSH USERS GROUP (BUG) SUBMISSION

MAY 2003

Submission No.336

"IT IS NOT SUGGESTED THAT THE FIRES OF 1939 COULD HAVE BEEN PREVENTED, BUT MUCH COULD HAVE BEEN DONE TO PREVENT THEIR SPREAD AND THEIR ATTAINING SUCH FORCE AND MAGNITUDE"

Stretton Royal Commission 1939

EXECUTIVE SUMMARY

The recent disastrous Wildfires are a graphic pointer to wide and endemic problems associated with poor, under-resourced management of our parks system. We doubt that parks as presently managed, can meet their 'protection of biodiversity' objectives. Our booklet "Flamin' Parks" accompanies this submission – published in August 2002 it predicted what was to come and shows how parks provide Claytons environmental protection.

Statements describing the fires as 'natural,' 'a one in a hundred year event' or 'something we have to live with' are either based on ignorance, or are a deliberate attempt at relieving state governments of the political and legal responsibilities which flow from admitting that the fires were predictable and preventable.

The climatic conditions preceding the fires are described almost exactly in the Stretton Royal Commission Report into the '39 fires as were the means of prevention and the disastrous ecological and human consequences. Therefore there is a prima facie case that current forest management, particularly parks management policies, must be a mix of ignorance, gross negligence and under-resourcing.

In any practical sense, parks creation and management policies are based on the principle of 'benign neglect.' This implies that the act of removing most commercial and recreational activities (particularly timber harvesting) constitutes environmental protection or 'saving the forests.' Further, there is an erroneous presumption that there are no negative environmental outcomes following these exclusions.

As Tim Flannery observed this management by neglect is a form of 'terra nullius' which does not account for 50,000 years of aboriginal fire management and hunting which was essentially a form of commercial exploitation. In the context of the recent fires – they could not have occurred in the intense and almost unstoppable form they did under a regime approximating 'firestick-farming.'

Governments do not know the real economic costs of the parks system nor do they have a realistic estimate of the costs of maintaining biodiversity in parks. It is arguable that Australia's consistent (around $2 billion per annum) forest products trade deficit is substantially related to the instability caused by regular withdrawals of resource for parks. The effects of this deficit on governments' capacity to fund environmental or social programs have never been calculated or taken into account. Also the costs of lost opportunities, particularly in the forest products industry, have not been added to the bill that society pays for parks.

An uncalculated amount of the social and economic costs of parks are born by those living adjacent to park boundaries and in rural areas.

The Regional Forest Agreement Process has been effectively repudiated, for political gain, by all states except Tasmania. Green groups continue to demand more. Thus there is a certain prospect of further incremental additions to the parks and reserve system until it eventually encompasses all publicly owned forested land. All the problems that accompany the existing parks are therefore bound to grow unless governments place a moratorium on the creation of new parks.

WHEN WILL WE EVER LEARN?

In researching our submission we sought out the full report of the Stretton Royal Commission into the 1939 fires. We were shocked to find that most of the contemporary issues were dealt with 64 years ago. Why are we having to revisit?

We answer this question by first examining relevant parts of the Report, with extensive quotations and later explore some reasons why we are repeating history rather than learning from it. For the benefit of the members of this review we have supplied an electronic copy. It should be valuable as a means of putting present issues into context and may save time in formulating recommendations for the future.

CLIMATIC CONDITIONS

The Stretton Royal Commission Report describes (in its Introduction Part 1) how:

"For more than twenty years the State of Victoria had not seen its countryside and forests in such travail. Creeks and springs ceased to run. Water storages were depleted. Provincial towns were facing the probability of the cessation of water supply. In Melbourne, more than a million inhabitants were subjected to restrictions upon the use of water. ... and the forests, from the foothills to the alpine heights, were tinder."

These words describe almost exactly the circumstances prevailing prior to the fires which are the subject of the current review – they effectively destroy any argument that the fires were a 'once in a hundred year event' or a result of global warming as some conservation groups claimed.

PRESCRIBED BURNING

Stretton identified "totally inadequate" prescribed burning as a major cause of the intensity of the '39 fires. He put this down to the education of foresters who "were averse to burning of any sort" and that in any case neither the Forests Commission nor the Lands Department "had the staff to carry out preventive works in protected forests." We will return to the issue of adequate staffing of land management authorities later in this submission.

In other parts of the report (which will undoubtedly prove prophetic for Melbourne's water catchments) the Commissioner, referring generally to inadequate prevention – particularly insufficient controlled fuel reduction and to the Board of Works policy of not conducting "preventative" burning within catchments wrote:

"So it would appear, by the argument advanced by the Board, that, having regard to the ***known cycle of abnormal seasons, the Boards property must remain dangerously inflammable.*** *(our emphasis) It appears that a large part of the Boards policy of prevention of outbreak and spread of fires is to be left to Nature. Nature, however, in another department of its working, sends the abnormal season which encourages the major fire which consumes the forest."*

WILDFIRE AND THE ENVIRONMENT

Some of the environmental consequences of wildfire were already well known all those years ago. At Chapter 5 Stretton describes in detail the sorts of massive, water polluting, erosion events which follow intense fires.

"Where fire is sufficiently severe or frequent, it consumes the decaying litter of the forest floor, and beneath that litter, the humus of the earth. The productiveness of the earth is thereby lessened or destroyed. Furthermore, where the mat of the forest floor is so destroyed, the rain which falls, having no impediment to its flow upon the ground, escapes to the rivers and creeks in greater volume..."

These are precisely the same events, which buried a Department of Sustainability and Environment utility to its windows in mud and boulders and filled the cab in early 2003 - drowning a DSE employee returning from putting out spotfires. Two other employees narrowly escaped drowning or being buried alive beneath uprooted trees, mud and boulders.

However, there is another problem that the Stretton Commission was probably unaware of. A recent report into catchment hydrology shows that regrowth in the burned catchments will negatively affect run-off into the Murray River system for up to eighty years. The report suggests irrigators will have to take the pain as young trees suck up the water.[1]

Leaving catchment forests to manage themselves is not an option – they must have controlled small-scale burning and regeneration that minimizes water losses, erosion and pollution. The alternative is that wildfire will burn millions of hectares and water supply systems will be filled with silt and pollutants.

It is possible that thinning of Regrowth, commercially if possible, will assist to maintain water yields. This should at least be investigated.

FIRE TRAILS

The Commissioner noted the need for an extensive network of tracks and roads for access to conduct fire prevention and suppression works. He recommended

"the cost of road-making should be added to the royalty rate payable by the sawmillers" to finance their building and maintenance.

There is now such a levy system in place in Victoria but as state forest is alienated for parks the responsibility is transferred to the taxpayer and many tracks fall into disrepair or are closed to prevent access.

When the inevitable fire occurs a new roads system has to be hastily bulldozed. After the fire, the cycle of track deterioration and closure begins again.

DEAD TREE REMOVAL

Stretton recommended that standing dead trees along tracks should be removed for safety reasons. A 2001 review of the Victorian Log Hauling and Harvesting Sector, found that numerous fatalities and injuries are caused by standing dead trees falling on forest workers. In a wildfire situation there is an increased risk of burning dead trees falling – including falling across tracks and slowing access or retreat for firefighters.

While there is agreement regarding removing fire-killed trees from state forests to supply the timber industry, the Victorian Government has ruled this out for national parks.

An intelligent reversal of this policy could provide many benefits additional to human safety:

Royalty and roading income for the state.

Increased employment in the timber industry.

Offsetting some of the negative effects on sustained yield caused by past government miscalculations and the losses from the wildfires.

DAMS

Commissioner Stretton noted the need for water storage dams throughout the forests for convenient access for fire prevention and suppression.

Such dams that now exist are often filled with earth in order to return the bush to its 'natural' state.

The ecological costs of wildfire and the human safety aspects of more efficient access to water for firefighting are not brought to book in the single-minded pursuit of the holy grail of naturalness.

BURNING WASTE

Wood wastes from harvesting operations and mill wastes (offcuts, sawdust etc) were identified as contributors to fire danger and intensity. Recommendations were made for burning the wastes with the costs added to the timber royalty. Since that time, ways have been found to utilize this material in paper manufacture, charcoal manufacture and power generation – ways that create jobs for people and tax revenues for governments.

Green opposition to and misrepresentation of these practices e.g. portraying woodchipping as deliberate forest destruction - leads to millions of tons of waste wood being left on the forest floor while some state governments ban its use in charcoal manufacture or power generation. The Victorian Government is even beginning to restrict domestic firewood collection. Regardless, this wood is burned by wildfire on a regular and predictable basis without the benefit of producing jobs and taxation revenues. Also it adds carbon dioxide to the atmosphere without the advantage of reducing fossil fuel use.

MACHINERY

In 1939 much forest road construction was performed by hand, using unemployed relief workers. Commissioner Stretton found this to be inefficient and recommended "petrol driven machinery" be introduced. While no return to road construction by hand is likely, we are losing vital equipment and expertise with the gradual winding back of the timber industry and its harvesting contractors. Government departments now rarely possess the equipment or staff necessary for road and firebreak construction.

Future wildfires will be able to spread much further before the bulldozers arrive and experts who know the country may not be available to drive those machines.

FIREBREAKS

Commissioner Stretton made recommendations regarding extensive permanent firebreaks at forest margins wherever settlements were considered to be in danger. He suggested that the width of these areas should be decided according to local conditions but could be up to a limit of half a mile. Further recommending that the establishment and maintenance of such firebreaks should be a legal requirement upon the Public Authorities with the same penalties for non-compliance as would apply to a private landowner.

Such firebreaks should be implemented around towns and where parks adjoin private properties – this would provide an effective answer to the just complaint

that where thick forests grow up to property boundaries, the line of defence is within the property and boundary fencing is frequently destroyed.

Creating a system of firebreaks could be done in such a way as to increase biodiversity. Rather than clearing trees entirely, the forest could be thinned at its boundaries and the understorey subjected to regular fuel reduction burning and where appropriate, grazing. In some cases it would be feasible to have the timber and cattle industries perform the work and defray costs though timber royalties and grazing leases etc.

This will be portrayed as vandalism by green groups but would merely return the forest to the open structure that preceded the gradual abandonment of aboriginal firestick farming.

STAFFING

The Commissioner described the numbers of field staff available to the Forests Commission as "ludicrous." Unfortunately that description still applies.
Victoria's Auditor-General has recently found that DSE did not have sufficient funds and staff to meet its own prescribed burning targets. Minister Thwaites response was to say that the targets were unrealistic and imply they should be reduced![2]

REASONS

Plainly we have not returned all the way back to the parlous state of fire mitigation that existed in 1939. But it is clear that the trend is back to the future.

Why?

Prior to European settlement, thousands of indigenous people traveled the Australian Continent – managing the land for food, warmth and shelter. Today we would call it commercial exploitation and wash our mouths out! Their land management tool was the cheapest and most effective available – fire. By settler's and explorer's accounts they used this tool in almost every corner of Australia and with great frequency – they were not constrained as we are, to autumn burns and there was no environmental authority to complain to about air pollution.

As a predator species and free of animal liberation, they extracted wages for their land management work by eating moths, rodents, snakes, lizards, kangaroos and koalas. They even ate the species they had introduced – the dingo. Unfettered by sentimentality, they ensured that no species numbers grew beyond natural limits.

Without planning permission they used fire to construct roads through the forests and keep the roads open. They disturbed the land by fossicking for rodents, snakes and lizards. Often the soil disturbance would have caused a eucalypt seedling to sprout.

With no bureaucracy, no conservation movement, no public consultations and endless planning meetings the whole process must have been very efficient! Except for the babies, every member of every clan was classified as a field officer and was on the job – not in the office.

The implications of these past management techniques for the Bushfire Review are:

1. The frequent burning regime generally produced an open, grassy forest structure (park-like was a frequent settler description) where intense fire was rare.

2. The massive erosion which now follows wildfire would not have occurred as the burning was patchy, as against thousands of square kilometres cremated in wildfires and not intense enough to destroy roots and soil structure.

3. The patchy, low intensity nature of firestick farming would have allowed many more animals to escape and would not have broken the food chain over millions of hectares.

4. The fauna dependent on an open forest structure would have been present in greater numbers – not locally extinct as they are today.[3]

In summary, a prescribed burning regime and active use of the land, can achieve both good safety and environmental outcomes and is necessary for both. It seems obvious that we must return to a similar management regime or find ways of producing the same outcomes – lower risk of intense fire and greater biodiversity.

What are the obstacles?

The public has been generally convinced by green groups that human intervention in parks is undesirable. Also the average person would see fire, even managed fire, as destructive and air polluting. It will be necessary to conduct public education campaigns to show how managed fire produces a better biodiversity outcome than wildfire. The recent fires should provide numerous practical examples.

The greatest obstacle is likely to be cost and a first step must be to estimate with reasonable accuracy what it costs per hectare per annum to restore and maintain

our parks to the pre-European standard adopted in the RFA process. We predict some great difficulty arriving at a realistic cost estimate for parks because, to our knowledge, there has been little or no work done to manage parks as well-costed projects with defined outcomes, adequate budgets and public criticism if targets aren't met and budgets are blown.

Prescribed burning expert Phil Cheney of the CSIRO and ecological burning expert Kevin Tolhurst of Melbourne University have called for more burning but have, understandably, not been in a position to put a number on the staff required.

Tolhurst, in a paper presented to an Institute of Public Affairs conference following the fires, states that the average number of days suitable for burning in each area of Victoria is only twelve! The implications of this information for the number of field staff required, just for prescribed burning, are enormous.

Therefore it will not be sufficient for this review to merely call for 'more field staff.' What is required is a multidisciplinary group of experts to define the work required for maintenance of biodiversity (not just prescribed burning and eco-burning) in each park, precisely how many staff are required and what it would cost.

The costs of destruction of property around parks, including feral animal and weed management, should also be calculated and ultimately be borne by the whole community.

We suggest that the opportunity costs of parks should also be calculated. So far, governments have avoided this by slow incremental destruction of the timber and mining industries – never accounting for the cumulative effect on our trade deficit and unemployment figures or asking what other environmental or social programs will be cut or delayed.[4]

The combined maintenance and opportunity costs for our forest parks are likely to be staggering – especially given that parks are probably not protecting biodiversity under current management regimes. Bringing these issues into the open would start a public debate about managing parks for environmental outcomes rather than as dangerously neglected icons.

MORATORIUM NEEDED

The RFA process was supposed to deliver a forest reserves system that was comprehensive and adequate. It was also supposed to deliver stability for the forest industries after years of inquiries and resource withdrawals. Accepting this, forest communities and industries agreed to another round of painful job losses, consoling themselves that the future would be more certain.

In fact all states, except Tasmania, have broken the RFA agreements and a process that cost hundreds of million of dollars is now almost worthless. Recent elections in Victoria and NSW were preceded by Labor promises of more parks in exchange for green preferences. Premier Carr had the freshly smouldering lessons of the NSW fires but ignored them. Premier Bracks cannot adequately fund the existing Victorian parks yet has inquiries under way for at least two more.

A search of any conservation group web site will not produce a single hint that their forest agenda has been completed. We have supplied a sample from the Wilderness Society. (Attachment)

All of the problems identified in our and other's submissions are therefore destined to grow and the tragedies destined to be repeated unless a moratorium on the creation of new parks is declared.

RECOMMENDATIONS

1. Those findings of the Stretton Royal Commission that we have identified should be implemented through consultation with rural communities, industry, farmers and regional CFA members. Including the establishment of firebreaks between parks and private properties and towns. Wherever possible, the costs of such work should be reduced by involving commercial interests such as grazing and timber.

2. Governments should conduct public education campaigns regarding the need for prescribed burning as both a fire mitigation and ecological tool.

3. Trials should be conducted to ascertain the effectiveness of commercial thinnings in reducing long-term water losses to river systems.

4. A scientific inquiry into a representative sample of parks should be conducted in order to audit them against biodiversity objectives. This same inquiry should identify and cost the work necessary to return parks to their pre-European condition – following the principles adopted in the RFA process.

5. An economic inquiry should be commissioned to quantify the complete collateral costs of parks to the community in general and the extra social and psychological costs born by those individuals, industries and communities situated close to parks. This inquiry should also identify and cost the lost opportunities e.g. paper mills, sawmills, mines etc and the costs of structural adjustment packages.

6. A national moratorium should be declared on the creation of new parks pending the results of the abovementioned inquiries.

We also refer members of the Review panel to the content and recommendations in the accompanying booklet Flamin' Parks for a more complete explanation of BUG's concerns, policies and recommendations.

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[1] Co-operative Centre for Catchment Hydrology Studies. Reported in The Weekly Times 7/5/03 p18.
[2] Victorian Auditor General May 2003. Minister's comments reported in "The Age" May 9th 2003.
[3] See "The Future Eaters" by Tim Flannery Chapter 32.
[4] See the accompanying booklet "Flamin' Parks" for a more detailed explanation of lost investment in the forest products industries and the ways commercial and recreational interests can be harnessed for park management at lower costs.