NAFI Responses to Questions from Senator Ian Macdonald (7/11/06) for the Senate Inquiry into Australia's National Parks

1) How is the regulatory and monitoring system which applies to production forests different from that which applies to national parks?

The National Forest Policy Statement (1992) and the Regional Forest Agreements (of which there are 10 implemented across Australia) provide the overarching regulatory framework to support sustainable management of Australia's native production forests.

Management of these forests is governed by:

Regulation

- Strict legislated external regulations and licence conditions are in place.
- For example, for native forests managed by Forests NSW, licences are issued by external regulatory authorities such as the Environment Protection Agency (EPA), the National Parks and Wildlife Service (NPWS) and NSW Fisheries.
- These licences govern areas of forest management associated with soil and water protection, threatened species management and cultural heritage protection etc.
- Forests NSW are subject to regular reporting requirements and auditing procedures from these regulatory authorities.

Codes of Practice

- Management is also determined by comprehensive codes of practice.
- These cover all management activities which take place including harvesting, prescribed burning, wildfire suppression, weed and feral animal control, roading etc.
- These codes of practice and regulations are reviewed periodically and revised to reflect improvements in forest management.
- These improvements are guided by the results of flora, fauna, soil and water monitoring programs.

Certification

- It is important to note that much of Australia's forest industry has adopted independent certification of its forest management activities.
- Consumers, both domestically and internationally, are increasingly demanding assurance that the timber they purchase is from legally and sustainably managed forests.
- Certification under the Australian Forestry Standard (AFS) provides this through strict requirements. It is Australia's only national certification standard which certifies native forests. It is strongly endorsed by the Australian Government.
- The basis of sustainable forest management delivered under the AFS stems from the international set of Montreal Criteria and Indicators, which were developed during the 1990s.
- One important advantage of the forest certification and monitoring system is that it provides advice to the forest managers on whether there have been any changes in the forest characteristics over time, and where and how their forest management practices can be improved.
- It provides a system for auditing and reviewing the management approaches that could be applied to national parks and reserves.

While there are undoubtedly a number of regulatory requirements applying to the management of national parks, there is not the same level of accountability and reporting and monitoring requirements to independent authorities which applies to multiple-use forests managed for timber production.

2) What evidence is there which supports your claim that national parks are not adequately resourced on the ground?

There have been a number of inquiries conducted following severe bushfire seasons in Australia, particularly the 2002/03 season (e.g. House of Reps Inquiry 2003, COAG Inquiry 2003, Victorian Auditor General's Report 2003) – common to all these inquiries was the identification of a lack of resourcing by national parks management agencies to conduct prescribed burning (see quotes in Question 3 below).

As contained in NAFI's submission to this inquiry, in 1999, the World Conservation Union (through their publication Parks Volume 2 – June) show:

- Staffing numbers for reserve management in Australia is much lower than in other countries. The global mean staffing level is 27 people/100,000 ha and 26.9 people/100,000 ha in developed countries. At the time the IUCN report was released, the figure for Australia was just 6 people/100,000 ha.

The Annual Reports of 2004-05 show that only 20% of the NSW NPWS staff are employed as field officers (1 field worker per 10,800 ha). In stark contrast, Forests NSW employs 46% of its work force as field officers (1 field worker per 5,800 ha).

260 NPWS Park Rangers manage over 6 million ha (7% of NSW) of national parks in NSW. This equates to only one ranger every 23,000 ha.

3) What evidence is there which supports your claim that not enough hazard reduction burning is conducted within national parks?

Below are some quotes from a number of inquiries conducted following severe bushfire seasons in Australia, particularly 2002/03:

- House of Reps Inquiry 2003 stated '…grossly inadequate hazard reduction burning… and poor access… to the fire sites'
- Victorian Auditor General's Report recommended 'an increased focus on strategic management of hazard reduction on public land'.
- Inadequate hazard-reduction burning had already been a major theme in the report of a Select Committee of the NSW Legislative Assembly on the 2001–02 bushfires.
- The first recommendation of the McLeod Report on the ACT fires was that '…fuel management through controlled burning is the only practicable way of reducing the excessive buildup of fuel loads in the ACT's extensive areas of park and forest'.

Also, as shown in the NAFI submission, over the past 12 years NSW NPWS conducted prescribed burning on an average of only 0.6% of their estate each year. Forests NSW on the other hand achieved 4 times the NPWS average with 2.4% of their estate treated by prescribed burning each year.

Over this period, less than 2% of Forests NSW estate burnt through wildfires, and over 4.6% of NPWS land experienced wildfires. In the fire season of 2002/03, only 6% of Forests NSW estate was burnt by wildfires whereas over 17% of the NPWS estate was burnt.

In summary, less than half (45%) of the burning in Forests NSW is uncontrolled in the form of wildfires (the remaining 55% is prescribed burning), whereas 88% of burning in NPWS is uncontrolled (only 12% is prescribed burning).

Over 1.5 million ha was burnt through wildfires in NSW in the 2002/03 fire season. Of this, just over 1 million ha, or over two-thirds of the area was on NPWS land.

The Victorian Department of Sustainability and Environment's (DSE) official Website states that only 45,000 ha of prescribed burning occurred in 2003. This amounts to 0.5 per cent of the 8 million hectares of forest land which the Department is responsible for managing. According to the Victorian Association of Forest Industries, this compares to an average of 225,000 hectares in the decade from 1974 to 1984. This is a dramatic reduction in prescribed burning over time.

In the NSW NPWS State of the Parks Report 2003, it is stated that some 72% of national parks in NSW (or 59% of the area classified as national parks) were identified as having inappropriate fire regimes, producing a significant threat to the natural and cultural heritage of the parks.

4) You mentioned that there is growing scientific evidence on the decline in health of reserves, can you provide some examples of this evidence?

See below some scientific research references:

- Juskis (2005) 'passive management of nature reserves in Australia has failed to maintain healthy ecosystems'.[1]

- In NSW alone, it is estimated that between 20 and 30% of the coastal forests are already suffering from a moderate decline in forest health due possibly to the lack of active management regimes for those "protected" areas (Jurskis, 2005)[1].

- (Jurskis, 2004): 'Conservation management currently seems to be directed mainly towards designating reserves rather than physically conserving forest ecosystems and maintaining their health. Forest health decline and increasing fire control problems are two facets of a problem arising from passive management philosophies. State government policies and regulations encourage passive management and discourage active management for conservation. They require assessments of the environmental consequences of active management but not of passive management even though the consequences of passive management can be very severe.'[2]

- 'The declining health of the dominant components in these 'undisturbed' forests suggests that natural processes have been disrupted by fire exclusion.'[2]

- 'Regulations in NSW exclude low intensity burning from much of the landscape including wilderness, old growth, rare ecosystems, habitats of rare plants or animals, and drainage lines. They focus on individual organisms, target species and fire frequency. They don't require assessments of the consequences of not burning. This regulatory environment encourages forest decline and more widespread high intensity fire regimes.' [2]

5) What is your response to claims that prescribed burning can be detrimental for biodiversity?

Large high intensity wildfires:

• Cause enormous environmental damage, especially to soils and hydrological systems;

[1] Jurskis (2005). *Eucalypt decline in Australia.* In Forest Ecology and Management.

[2] Jurskis, V. (2004). *Forest health decline in coastal New South Wales.* In Proceedings of Forest Management Workshop, Canberra, 23-25 March, 2004.

• Homogenise ecosystems across whole landscapes, by re-setting the entire regeneration cycle back to scratch;
• Kill wildlife in vast numbers;
• Damage water catchments;
• Destroy endangered species recovery programs and research projects;
• Destroy recreational infrastructure;
• Are a threat to rainforest communities;
• Escape from the national parks and cause heavy social, economic and psychological damage to neighbours and to community infrastructure;
• Are a serious threat to the lives of firefighters.

These outcomes do not result from frequent, low intensity fire carried out for ecological reasons.

The claim that prescribed burning is detrimental to biodiversity appears to be based on misunderstandings of prescribed burning and extrapolation from observations of wildfires.

See also the response to Question 4 above.