



Wafa

**Western Australian
Forest Alliance**

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Environment Centre • Busselton Peace and Environment Group • Collie Conservation Group • Conservation
Council of WA • Darlington Adopt-A-Block Denmark Conservation Society • Denmark Environment Centre
D'Entrecasteaux Coalition • Doctors for the Preservation of Old Growth Forest • Friends of the Blackwood Valley
Friends of Giblett • Friends of Jane • Friends of Kingston • Friends of the Tuart Forest • Grassroots Activist Forest
Alliance • Greater Beedelup National Park Society • Great Walk Networking • Leeuwin Conservation Group
Margaret River Environment Centre • South Coast Environment Group • South West Environment Centre
South West Forests Defence Foundation • The Wilderness Society • Warren Environment Group

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Dr Roy Green

Chairperson, EPA review of CALM's fire management

EPA

St Georges Tce

Perth 6000

Dear Dr Green

Opening submission of the WA Forest Alliance

1. Conflict of interest

Despite all the risks and costs associated with it, CALM continues to have an annual target of prescribed burning (PB) of 200,000 hectares of the South West environments it manages. No independent assessment has ever been made as to the need for or usefulness of this target.

Furthermore, the fact that CALM rarely meets this target, because it is absurdly high, is used every year to stir up a media/political campaign around the claim that CALM is "falling behind" in its burning program and needs more money and more public tolerance for more burning. It is a simple, simplistic and manipulative tactic but it works.

Wafa believes that the main reason CALM sets this target is that it bases its multi-million dollar fire management financial request to government around this figure, even though it knows that it is virtually unachievable, largely ineffective, and to achieve it would be very risky entailing large burns under dangerous conditions that would put people, property and the environment at risk. If CALM was to reduce the area it said needed to be burnt each year, based on a proper assessment of the costs and benefits of PB, then it would be under pressure to reduce its multi-million dollar burn budget, which like any agency it is very reluctant to do.

So we end up with a classic conflict of interest: CALM claims to be burning to fulfill its conservation (and community safety) function and yet the amount of burning it does, or tries to do, is based on

commercial and organisational considerations, not science or biodiversity protection, or even public safety.

2. An end to policy by scaremongering

Proponents of massive PB always try to focus the debate on the heroics and dangers of firefighters: “If we don’t do more and more PB our heroic firefighters will die in the bush protecting suburbs from out-of-control wildfires.” Once again a simple, simplistic and very emotive public relations strategy, which politicians find irresistible.

However, there is a more rational approach.

To the extent that the community is at risk from wildfire there are clear factors involved and strategies that can be implemented that have little or nothing to do with “fuel loads” in remote forests, PB, or heroic fighting of intense wildfires. To base fire management and community safety decisions and policies around the fighting of out-of-control wildfires is absurd. With proper planning there should be no circumstances where direct attack on intense wildfires by ground-based crews is contemplated.

To avoid this scenario, there are three requirements:

- maximum effort in preventing wildfires, which means tackling arson;
- maximum emphasis on early detection and rapid suppression of unplanned fires before they become major wildfires;
- maximum effort to make communities and infrastructure as safe from the impacts of fire as possible through well-known planning, design and preparedness strategies.

Under this strategy, instead of running around wasting money burning large areas of remote forest, wetland, woodland and heath and pretending we’re protecting the public, we concentrate the effort where it will be most effective and least risky to the public and the environment.

If the community is safe from the impacts of wildfire, then that takes most of the heat out of the argument about the usefulness and impacts of broadscale prescribed burning: we don’t have to worry about the suburbs burning down, therefore we don’t have to send the firefighters out to risk their lives fighting out-of-control wildfires, therefore we don’t need to argue about whether PB makes it easier to fight wildfires, therefore we can concentrate on the other, less emotive aspects of wildfire and PB policy.

3. Science, biodiversity and prescribed burning

When addressing issues of fire and the environment, proponents of massive PB rely, explicitly or implicitly, on three assumptions:

1. That our environment today is the same as it was 200 years ago. In fact, we now live in a radically altered environment which, amongst other things, is more fire prone and much less able to cope with and recover from the impacts of fire, including PB. Some of the changes made by European settlers which contribute to these outcomes are:
 - i. clearing and fragmentation of native vegetation;
 - ii. roads, powerlines, pipelines and other infrastructure corridors criss-crossing the forest region which make natural environments more fire prone and give easy access to arsonists;
 - iii. changed structure, opened canopy and logging debris in remaining forests;
 - iv. climate change including reduced rainfall and more days of extreme fire danger (days when PB is rendered useless);
 - v. dieback and other introduced pests (e.g. weeds) and diseases;
 - vi. loss or decline of species including large numbers of herbivores which probably played a key role in reducing the risk and impact of wildfires in pre-European south west WA;
 - vii. repeated burning, which tends to make our environment more homogeneous and prone to burning.

Each of these changes and impacts on their own and more importantly in combination means that our natural ecosystems and native species are more vulnerable than ever to the impacts of disturbance, including fire - whether wildfire or PB.

2. That our ecosystems and species are uniformly “adapted to fire” and “need” fire. In fact many leading scientists and published peer-reviewed scientific papers challenge and/or reject the simplistic notion that Australia’s flora, fauna and ecological communities are adapted to fire or need fire, e.g. Hopper et al; Dixon et al, etc. Whatever ability species and communities have to recover from fire does not mean they need it, or that they can recover from frequent fires, especially frequent intense or unseasonal fires, or that their ability remains intact no matter how altered the environment becomes or how reduced in numbers or extent they become.

Similarly, the notion that Aboriginal people burnt the entire jarrah forest on a 3 or 4 year rotation, as now widely claimed by proponents of frequent PB, is challenged by highly qualified scientists and peer reviewed scientific literature. It also defies common sense.

3. That there is no evidence of the adverse impacts of PB, or that any impacts are dwarfed by the impacts of wildfire.

In fact there is a large and growing body of scientific literature and opinion which together shows that PB, especially in association with all the other changes and impacts referred to above, does have or can have profound impacts on flora, fauna, ecological communities and ecosystem health, e.g. York et al; Horwitz et al; Wardell-Johnson et al; Woinarski et al; Gill et al.

Many fauna species have become extinct in the south west of WA or now survive in greatly reduced numbers (WAFAs has complete lists of extinct and endangered species for the South West, including those most affected by frequent fire), often dependent on habitat and conditions which are increasingly imperiled by a range of impacts and disturbances including fire. Many other species and communities are known to have particular vulnerabilities to fire e.g. Gondwanan relictual species; obligate seeders with long juvenile periods, etc. Further, little is known about the current status or ability to cope with PB of many invertebrate fauna species and non-vascular plants such as fungi. These species are essential to the health and vitality of all ecosystems.

When addressing this issue we must also be mindful of the many “collateral impacts” of PB, including the damage caused by the construction of roads for fire management and fire fighting (e.g. loss of native vegetation; erosion; increased spread of dieback); the felling of old growth habitat trees classed by CALM as “dead or dangerous”; spread of weeds; exposing wildlife to increased predation, etc.

The EPA has a responsibility to acknowledge, refer to and document the large assembly of peer reviewed and published scientific literature which shows the risks to and impacts of fire, including PB, on our natural environment, ecosystem health and biodiversity. WAFAs and the Conservation Council have several lever arch files full of published, peer reviewed scientific papers from WA and elsewhere around Australia addressing these issues. We trust that unlike the PB lobby, the EPA will acknowledge the existence of this extensive literature and its implications and incorporate its findings into the review report.

WAFAs

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