

From: NE Bioregional Network

Sent: Wednesday, 1 May 2019 11:29 AM

To: SFMC (TFS); AFAC Review (DPFEM)

Subject: Re: PUBLIC CONSULTATION OPPORTUNITY: Management of bushfires during the 2018-19 fire season

RE Review of Management of Bushfires.

Thankyou for the opportunity to comment on this important land management issue.

Firstly we would like to acknowledge the important role that firefighting plays in protecting lives, properties and in some cases the environment.

Unfortunately we don't have time to make a more comprehensive representation but we will highlight some of our concerns which we hope contribute to improving fire management in terms of environmental outcomes

1. The issue of firebreaks. If firebreaks are not properly closed off and rehabilitated post fire they become vectors for rubbish dumping, weeds, diseases and off road vehicles use. In addition erosion can also occur. In one case we are aware that a covenanted private piece of land was traversed by a bulldozer/excavator a number of times damaging the conservation values present and without direction to do so and against the wishes of the landowners
2. Use of PFAS foam to suppress fires. How much PFAS is being used to fight fires in Tasmania (if any) and how are its impacts monitored? Is PFAS being injected into peatlands to put out such fires?
3. The use of regular low intensity fires for prescribed burning (or "cultural burning") will over time reduce the diversity of understorey species in heathlands and dry forest and woodlands with diverse understoreys. Despite this fact this practice is endorsed by prominent fire authority people such as Chair of the State Fire Management Council Ian Sauer in public (Country Hour 16th Sept 2018).
4. There is inadequate surveying for biodiversity values before burning. A NVA desktop analysis is no substitute for onground assessment. Each site requires site specific on ground analysis rather than broad generic analysis via TASVEG, NVA and burning at 7 to 10 year intervals. There is already evidence that for instance that *E.sieberi* forests have been over burned historically yet regular fuel reduction burning is still planned in such ecosystems.
5. We are concerned that many native forests are burnt to protect Radiata Pine/ *Euc nitens* "assets". This is not an acceptable use of public money as these plantations are mainly owned by or leased to foreign investment corporations.
6. Permits for fire management activities require a permit from the Break O Day Council. No such permits have been approved by Council or applied for by various agencies
7. There are no independent community conservation representatives on fire committees in Tasmania
8. Some planned burns need to be referred to the Commonwealth/EPBC if they involve the potential loss of listed flora/fauna species
9. The new Statewide Planning Scheme does not direct new residential development away from fire prone areas leading to further risk for fire fighters, more clearance of native vegetation and more pressure for more prescribed burns.
10. Lack of resources for post fire management of emergent weeds. In some cases fuel reduction burns are carried out in weed infested areas ie Gorse and no follow up is undertaken. A good example of pro active management of Gorse post fire has been the Seymour Community Action Network ecological restoration project.
11. A fuel reduction burn carried out next to the White Sands resort near Four Mile Creek 27/5/18 so impacted the natural values of the land that the Tasmanian Land Conservancy decided not to pursue purchasing it for conservation purposes because it no longer met its criteria for natural values.
12. We support the notion of resourcing rapid response fire fighting infrastructure to hopefully reduce the risk of fires escaping into fire sensitive ecosystems such as alpine and rainforest areas and to protect life and property.

Regards

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