



2 May 2019

Dr Felicity Novy
Review Team
Australasian Fire and Emergency Services Authorities
Council (AFAC)
GPO Box 1526
HOBART TAS 7001

Via email: AFAC.Review@dpfem.tas.gov.au

Dear Dr Novy,

Thank you for the opportunity to participate in the *independent review of operations during the 2018-19 bushfire season*.

This submission represents all the major commercial forest growers and managers in Tasmania via their respective membership of the *Tasmanian Forest and Forest Products Network (TFFPN)* and their input and approval of this paper.

About the TFFPN

The TFFPN provides an inclusive, open and transparent platform on industry matters for all those people who either work within or who support a productive, sustainable and profitable forest industry in Tasmania. To achieve this the role of the TFFPN includes:

- Being a communication hub;
- Providing informed policy advice to government and the industry;
- Providing a focal point for Government to communicate high level issues of common concern across the Network;
- Fostering Research and Development in the industry;
- Promoting skills development and career paths across the industry;
- Providing a linkage point across the industry to coordinate policy, government responses and other matters of common interest;
- Community engagement and education, providing information about the issues in the industry and building support for those who work in it;
- Promoting the Brand; and
- Building partnerships and align interests.

More information on the TFFPN can be found here <https://www.tffpn.com.au/>

Specific TFFPN Members Represented in this Submission

- Forico Pty Limited
- Sustainable Timber Tasmania
- PF Olsen Australia
- AKS Forest Solutions
- Timberlands Pacific Pty Ltd
- Reliance Forest Fibre
- Norske Skog

Individually and collectively, these stakeholders (Network Members) have been significantly impacted by unplanned fires in the 2018/19 period. With specific reference to the January 2019 fires impacts for these growers and managers are summarised as;

- 3,500 ha of hardwood plantations;
- 500 ha of softwood plantations;
- 35,000 ha of private natural forest; and
- 35,000 ha of public natural forests (Sustainable Timber Tasmania).

At point of sale these impacted forests represent a value to the Tasmanian economy in excess of \$100M.

In addition, Network Members report other impacts beyond the primary forest assets including;

- Neville Smith Products and Ta Ann processing mills at the Southwood site;
- Tahune Airwalk;
- Warra Research Trial;
- Weld River Bridge;
- Numerous job losses/forced leave due to forest operation closures;
- Expenses and logistics associated with harvest operation relocations;
- Additional transport costs associated with road closures; and
- Long and short term impact on forest operation planning and scheduling.

On the basis of impacts outlined above, and Network Members experience in the management of fire, the TFFPN is well qualified to present this submission.

Opening Remarks

Network Members acknowledge that for the most part the January 2019 fires arose from natural causes and that the response task was significant and complex. In addition, Network Members recognise that Tasmania's three Fire Agencies are contemporary and capable professional institutions with a strong track record of protecting Tasmania from the impacts of unplanned fire.

This submission is provided by Network Members with some elaboration on supportive themes and acknowledgement of the calibre of the existing fire agency services. However, this submission assumes that most of this support is well understood and that a greater focus on opportunities for improvement is more appropriate to the current agenda.

Responses to the Terms of Reference

1. The causes, chronology and response of the 2018-19 bushfires in Tasmania on and following 28 December 2018.

Network Members acknowledge that for the most part the January 2019 fires arose from natural causes. The resultant bushfires were appropriate for management by an interagency Incident Management Team.

However, Network members consider that the response to some of the bushfires could have been enhanced through clear procedures and established processes providing advanced approval for fire management activities such as deployment of heavy machinery in sensitive areas, including reserve and conservation areas, allowing a more timely response.

As a separate point, and at the highest level across all fires, Network Members also submit that the firefighting directed by the interagency Incident Management Team could be characterised as 'wet firefighting'. That is, firefighting focused on the use of water as the primary control agent, and water deployed during 'business hours' or 'daylight hours' via aerial and ground-based means. Conversely, Network Members submit that an alternative 'dry firefighting' approach should be integrated in the fire response to provide more effective control in terms of timing, safety and cost. That is, firefighting is focused into the cooler evening and night time and is focused on the construction of mineral earth breaks and backburning. The forest industry has significant expertise and success in this style of firefighting in the past.

2. The effectiveness of community messaging and warnings.

Network Members acknowledge communication as a key pillar of fire response and fully support the central coordination of information through the Tasmania Fire Service Web portal. Further, the deployment of standardised advice levels and media protocols is supported.

Network Members acknowledge that the protection of human life must remain the highest priority for any communication strategy.

With the context of the above, Network Members report a low level of understanding and/or acknowledgement regarding the value of commercial forests in both the management directions of all interagency Incident Management Teams, and communication to the public. This statement is based on a long-held view arising well before the January 2019 fires. Subsequently, it is felt decisions may be made in accordance with an inaccurate hierarchy of potential loss value, despite the private forest industry supporting fire agencies with the same fire service levies as other stakeholders. Therefore, Network Members suggest a review of the economic consequence criteria of the Tasmanian Emergency Risk Assessment Guidelines to determine if it reflects the appropriate value of commercial forest assets. The Network Members stand ready to assist with this process and could, for example, prepare a simple ready reckoner for future value assessments.

- 3. The timeliness and effectiveness of the fire response and management strategy, including accommodating the priorities of life, property, forest asset values, environmental and cultural values and timber production by Tasmanian fire agencies.*

Submissions above are appropriate for this theme. Further, Network Members recognise that establishing values of forest assets for inclusion in any hierarchy of priorities for a fire response is necessary and challenging. To resolve this, Network Members propose a structured inclusion into future interagency Incident Management Teams of a 'Forest Industry Liaison Officer' whom will be able to assist with matters pertaining to commercial forests on behalf of the entire forest industry. This would contribute to meeting Recommendation 10 from the *Internal review of operations during the 2015-16 bushfire season* of ensuring local knowledge is accessed at all levels of incident management.

With respect to operational matters, Network Members report that the risk appetite from Incident Management Teams was too cautious. This report is evidenced by occasions where there was a blanket instruction to remove all fire crews due to weather forecasts when many crews had the option to work on black edges and further advance efforts towards 'dry firefighting' (refer Terms of Reference #1).

- 4. The impact and effectiveness of fuel management programs in the fire affected areas on the management and containment of the fires.*

Network Members recognise the value in strategic fuel management. However, the private forest sector also recognises the costs associated with this preventative strategy. Whilst supportive of the role of fuel reduction programs Network Members would also contend that the practice of commercial forestry is itself a preventative strategy in so far as removing fuel, providing a road network for access, and resources for an effective bushfire response. The January 2019 fires are a great example of outcomes possible when these factors aren't involved, and specifically the issues arising from limited access in forested areas not subject to commercial forestry.

5. *The effectiveness of state, regional and local command, control and co-ordination arrangements, to include agency interoperability and the co-ordination of emergency management activities with government and NGOs.*

Network Members are very supportive of the interagency Incident Management Team protocol provided access is available to the necessary information regarding assets under management. Further, Network Members promote the active engagement of the commercial forest sector within interagency Incident Management Teams and propose to facilitate a ‘Forest Industry Liaison Officer’ (see Terms of Reference #3).

6. *The effectiveness of the arrangements in place for requesting and managing interstate and international assistance and the significance of interstate and international assistance in managing the fires.*

It is entirely appropriate that reciprocal protocols are maintained for the sharing of resources at an interstate and international level. However, the points raised above regarding ‘wet versus dry’ firefighting apply here, particularly in so far as it relates to expensive aircraft.

Additionally, Network Members contend that the commercial forest sector is also a significant source of fire suppression resources with significant training and experience in managing bushfires, evidenced by the table below that details resources available from the private (non-fire agency) commercial forest sector. Note this excludes Sustainable Timber Tasmania.

Class 3	Class 5	Class 6	Personnel
6	14	21	103

Currently some Network Members have a Memorandum of Understanding (MOU) with Tasmania Fire Service that goes some way to recognising the industry’s capacity detailed above. However, it is apparent to all Network Members that an industry wide MOU may deliver material capacity improvements for a future fire response and can address a breadth of issues including hard assets, forest asset information, human resources, training and financial matters.

7. *The use and effectiveness of aviation firefighting resources, in particular, the suitability of aircraft types for the protection of environmental values, forest assets and the rural/urban interface in Tasmania. (Note: this should also focus on the potential effectiveness of Winch capable aircraft as a first response).*

Network Members support the use of aviation services for part of an integrated fire response. Aviation services are naturally well suited to reconnaissance and assisting remote area work. However, Network Members recognise that aviation resources are very expensive and are not well suited to all fire responses. Further, Network Members recognise that there is an increase in the availability and deployment of aviation resources and recommend that fire agencies undertake a review of the

effectiveness of these resources to ensure all future deployment of aviation resources is fit for purpose and efficient. It is appropriate to reinforce Network Members comments regarding 'dry firefighting' (see Terms of Reference #1).

8. *Any other matter that the Review team identifies in the course of its activities as warranting consideration.*

Road Access

Network Members note that road networks are impacted from fire and that safety must be actively managed in providing access into the road network after the fire is suppressed. However, it is also noted that the assessment process and remedial actions arising from such assessments is an onerous task and due to limited resources must be prioritised. Once again, it is appropriate that decision makers are fully informed and, in this case, recognise some of these road networks as critical freight routes for commercial forestry. This observation again supports the proposal of Network Members for interagency Incident Management Teams to appoint an 'Forest Industry Liaison Officer' including for 'after fire' matters such as road network re-entry. Also, the requirement to work rapidly with road owners and stakeholders, such a local government, must be emphasised.

Training

Network Members understand there are different minimum standards for firefighters between agencies and the forest industry generally. In some instances, this difference required some firefighting resources to be dismissed from fire ground management and without proper explanation or justification. The subject of minimum training requirements as well as practical pathways for basic fire awareness to trained fire fighter needs to be urgently clarified to enable the forest industry to respond before the 2019/20 season. As disclosed above, the subject of training could be appropriately addressed in a proposed industry wide MOU.

Standards for Equipment

Similarly to training, there is currently no formal minimum standards for equipment deployed on fire grounds nor is there an established benchmark to provide consistency between fire agencies. This presents uncertainty for the private sector and risks fire fighter safety. Once again, this could be appropriately addressed in a proposed industry wide MOU.



Closing Remarks

The TFFPN and Network Members listed here are appreciative of the opportunity to provide feedback to this review. Network Members provide a depth of experience that is arguably only surpassed by our three fire agencies. In addition, Network Members represent a significant part of our island economy and is by nature exposed to risks associated with fire. Accordingly, Network Members trust that these credentials support an appropriate level of respect for the recommendations and position the TFFPN as a significant stakeholder in further consultation.

Kind regards

Therese Taylor
On behalf of Network Members