

## Submission on the draft Victorian Bushfire Management Strategy 2023

The Victorian branch of Forestry Australia (previously the Institute of Foresters of Australia and Australian Forest Growers) welcomes the opportunity to provide this submission on the draft Victorian Bushfire Management Strategy. We would be happy to brief those developing the strategy face to face if the opportunity is available.

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### Who we are

[Forestry Australia](#) is an independent professional association of forest scientists, managers and growers who work in native forests, plantations and in the provision of environmental services across both public and private land. We acknowledge Traditional Owners, as Australia's 'first foresters' and their long-term custodianship of Country. Forestry Australia members have extensive experience in forest and fire management through roles as land managers, employees of emergency service agencies, and as volunteer fire fighters.

Forestry is the science and craft of creating, managing, conserving, using and caring for forests, regardless of tenure. It is this perspective that we bring to this submission. Forestry professionals now work in the public and private sectors, including with Traditional Owner groups and in the management of parks and reserves.

Forestry Australia is committed to the principles of sustainable forest management and applying these principles to generate environmental, economic and social outcomes in all types of forests, on all tenures. When we refer to forests, we are applying the definition applied through the Regional Forest Agreements (RFAs), which includes the land and forest environment within parks and reserves as well as the private and public land forest estate.

### SUBMISSION

Forestry Australia considers the draft Bushfire Management Strategy comprehensive, incorporating key elements important for bushfire management: people, ecosystems, research, evidence and capacity. We fully support outcomes 2 (ecosystem resilience), 3 (Aboriginal self-determination) and 6 (enhancing capability). The Strategy is largely consistent with Forestry Australia's recent document 'Actions required to improve forest fire management' (see attached).

However, the strategy is deficient in key areas to support effective communication and response to bushfire management.

**It is recommended the strategy begins with a short statement describing fundamental changes in our forest environment, what has happened in recent times and spelling out that we must take risks to lessen the impacts of future fire and that politicians, agencies and the community need to fully support those taking those risks on their behalf.**

Bushfire management needs to change. Current practices are not improving outcomes. Bushfire management is fundamentally a forest management challenge. We must shift emphasis from responding to events as they occur to actions to better prepare for and to limit the extent and impacts of bushfires. This task is immense, complex and difficult but must be faced with truth and honesty. More designated staff are needed in local areas to work on Country year-round with

authority and responsibility to monitor and actively manage land and forests and make local management decisions. Forest and Fire Management Victoria needs to move from a reactive seasonal 'fire-fighting' focus to employ more people year-round to use fire and other tools to manage forests for fire mitigation and resilience.

Other key gaps that need to be addressed to ensure the strategy is effective in achieving the vision of Victorians working together to manage bushfire risks fall into three key areas: policy, governance and practice.

## 1. POLICY

**It is recommended that the strategy clearly and strongly state the need to focus on bushfire prevention and mitigation. Fire agency personnel and volunteers implementing policy on behalf of the government to protect the community and forest values need to be fully supported and protected respecting this is often difficult and hazardous work.**

The Federal Government has a key role in tax collection, funding many state programs and national coordination.

**It is recommended the Strategy refer to elements of Australian Government's 2014 National Bushfire Policy Statement<sup>1</sup>, including learning to live with fire, effectively managing land with fire and the need for land, fire and emergency partnerships and capability.**

**It is recommended the Victorian Government work with the Federal Government to develop a new joint funding program to provide resources and capacity for ongoing, active forest management across all land tenures (public, private and conservation) including joint funding for Traditional Owner groups to develop and apply locally appropriate approaches to land and fire management, to heal cultural knowledge and expand the Working for Country program to support Indigenous-led Ranger Programs in Victoria.**

## 2. GOVERNANCE

### 2.1 Governance model

The Strategy presents a goal to 'establish and maintain bushfire management governance that enables the sector to work effectively together at state, regional, municipal and local levels to manage bushfires'. However, it does not describe a governance model for implementation. Responsibilities for Outcomes are not allocated to agencies. There is reference to the Office of Bushfire Risk Management, but the OBRM appears to have limited coordination authority across agencies for all aspects of bushfire preparedness, response and recovery.

With no governance model described, it is therefore not clear how 'the sector will establish effective cross-sector governance structures that integrate the protection of environmental values into decision-making' (Section 2.5). It is also not clear what types of Traditional Owner-led and collaborative governance arrangements for cultural fire will be established (Section 3.2) or 'how internal silos within the sector acting as barriers to Traditional Owners accessing and managing Country will be broken down' (Section 3.3). Traditional Owner led arrangements are likely to be extensive across landscapes and interact with other land management objectives.

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<sup>1</sup> <https://www.preventionweb.net/publication/national-bush-fire-management-policy-statement-forests-and-rangelands>

**It is recommended the Strategy include a clear governance model and a Table of responsibilities, similar to Table 2 in the 2021 State Emergency Management Plan – Bushfire Sub-plan.**

This could clearly assign responsibilities for different outcomes to different agencies or actors, including the roles and responsibilities of Catchment Management Authorities. This would improve the accountability for implementation and indicate how interactions between different management objectives or values will be managed if consent cannot be reached and processes to identify and manage disputes.

Forestry Australia supports genuine, open dialogue involving Traditional Owners, community members, government, NGOs and researchers on the best way forward to restore forest health and improve resilience to future fires. **It is recommended the Victorian Government commit to far stronger, structured formal involvement of local communities in management of their nearby forest with measurable accountable improvements in management.**

## 2.2 Strategy Indicators

These indicators are general and do not provide an adequate basis to assess performance.

**It is recommended that the Strategy include key performance indicators such as those in the recent document produced by the Forest Fire Management Group<sup>2</sup>.**

These are measurable outcomes which provide Forestry Australia with a means to systematically analyse Victoria's fire management progress across forests, parks, crown and private lands towards meeting the documented national goals

## 2.3 Land tenure

Land tenure arrangements can be a legislative impediment to effective fire management.

**It is recommended the Victorian Government carefully consider the consequences of further expanding conservation reserves without accompanying financial resources and capacity for active forest, fire and fuel management.**

## 2.4 Integrated approaches to planning

**It is recommended the strategy reinforce the recommendation from the 2022 Major Event Review under the Victorian Regional Forest Agreements to improve the integration of zoning systems within the forest management plans, national park management plans and bushfire management strategies. This process should include coordinated revisions and an improved articulation of active management strategies required for each zone, to reduce bushfire risk and support improved resilience and recovery of forests and their associated ecological values.**

## 3. CAPABILITY AND PRACTICE

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<sup>2</sup> <https://www.forestry.org.au/nbmp-objectives-kpis/>

**3.1 New Technologies.** In Section 6 (Enhanced capability and capacity) limited reference is made to new and emerging technologies and how they might improve operational outcomes. While these technologies are far from immediately addressing current bushfire management challenges, with more investment they can potentially increase effectiveness of forest management and bushfire preparedness and prevention.

**It is recommended that the Strategy give more attention to developing and deploying new technologies such as drones, new fire detection and monitoring tools, or satellite and near-earth technology platforms and systems to better monitor and protect firefighter workplace health and safety (including cancer monitoring and mental health).**

**3.2 Forest Industry Fire Management Capacity.** There is little mention of the role of forestry industry staff and contractors as a vital part of Victoria's bushfire preparation and response capacity. Victorian is also a leader in plantation Forestry Industry Brigades. Recent decisions by the Victorian Government will result in a reduction in this native forest management capacity. Concern about this loss of capacity in fire management was raised by The Victorian Government inquiry into the 2019-20 bushfires with the Inspector-General observing that<sup>3</sup>:

*The timber industry provides an important support capacity to fire management in Victorian forests with a skill set, knowledge base and operational experience in forest landscapes. The cessation of native forest harvesting by 2030 poses challenges for the fuel management program and bushfire response capacity across the state (Observation 4.3).*

**It is recommended that the Strategy give more attention to the important role and significant contribution of the Forestry Industry and how this capacity will be maintained and enhanced, including the role of plantation timber industry Brigades.**

**3.3 Forest Monitoring.** Understanding forest conditions is an important part of fire management preparedness and assessing the effectiveness of management strategies.

**It is recommended that the Strategy expand forest monitoring and reporting across the entire Parks estate to inform management, performance and effectiveness of the estate in achieving management goals.**

This includes additional field plots, more frequent remeasures of key indicators (e.g. annually rather than all on a 5-yearly basis) using emerging technologies

**3.4 Active and adaptive forest management.** This can support preparedness and prevention. Active management involves more extensive, skilful use of fire and other management practices to enhance and protect environmental values.

**It is recommended that the strategy increase expenditure and commitment to annual strategic fuel reduction treatments, mosaic cultural burning, and reinstating or upgrading road and track networks to support rapid access for quick and effective fire suppression and fund work with researchers and the community to investigate ecological thinning and other practices as**

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<sup>3</sup> Pearce T. 2020. Inquiry into the 2019–20 Victorian Fire Season. Phase 1 – community and sector preparedness for and response to the 2019–20 fire season. Melbourne (Australia): Inspector-General for Emergency Management.

**tools to improve habitat, reduce fire impacts, increase resilience and reduce impacts of drought and insect pests and disease stresses.**

#### **4. OTHER MATTERS**

- 3.5 The 'looking back' section (page 12) is not accurate. While specific data is given, for example, about the number of increased days with a fire danger greater than 'Very High' over certain times, little is said about more frequent extensive droughts and low rainfall that have driven major change in fire risks, such as the millennium (12-year) drought, the main climate event that has shaped our recent history of short-interval bushfires. Most fires in the last two decades (from their Figure 1) have occurred either inside the millennial drought period (1998-2009), or inside the post-period of "millennial drought legacy" (2010-2020) - a moisture deficit in the environment to deep soils at the catchment level. Since 2010, droughts have become shorter and sharper, with the highest BKDI ever recorded in 2019, and these exacerbated this legacy, collectively contributing to the 2019-2020 bushfires.
- 3.6 The description of the case study on reseeded alpine ash forests is not quite right (page 34). The reseeded response was not modelled. Sowing priority was FIRSTLY attributed based on ACTUAL damage assessments, undertaken by private specialists using remote imagery and sensing, and verification using oblique air-based photography covering 90% of the impacted Ash (about 80,000 hectares) to assess damage and seed bed receptivity. This field assessment information was overlaid with University of Melbourne models to provide a further level of (modelled) priority.
- 3.7 An important part of improving ecosystem resilience is maintaining a long-term flowering and seed-availability monitoring program (ongoing now for 30 years) and the Strategic Seed Bank for Ash species. This monitoring program has been successfully used to inform forest recovery efforts and seed collection planning. From this program we know that immature alpine or mountain ash forests rarely (if ever) hold sufficient seed to naturally recover after fire (hence the need for the reseeded program). It also cannot be assumed mature forests will set seed every year. For example, a report Forest Solutions indicates a troubling situation arising for summer 2024/25, when we even expect less than required seed in mature Mountain Ash canopies to naturally recover after fire. This occurred in 2007 for Alpine Ash in many places. This serious seed deficit for Mountain Ash will only be alleviated from February 2025 when predicted 2024 heavy flowerings could be ready for collection.
- 3.8 It is recommended that the Victorian government maintain the monitoring program and expand the strategic seed bank. All collection efforts in 2025 for the Seed Bank should be directed to Mountain Ash.**