

To
Mr Tony Pearce
Inspector-General for Emergency Management
GPO Box 4356
Melbourne VIC 3000

Personal submission

Inquiry into the 2019-20 Victorian Fire Season

Thank you for the opportunity to make a submission to the Inquiry.

See <https://www.igem.vic.gov.au/Fire-Season-Inquiry>

Due to limited knowledge, I will address only some of the criteria.

Focus

The focus of my concerns is on the jarring incompatibility between bushfires, native forest logging, and biodiversity. Native forest logging must cease, forthwith.

Caveat: This is a personal submission from Charles Street.

This submission is not intended to represent the views of any other person or organisation.

Introduction

From my backyard about 2.6 kilometres away, I witnessed the fire on Balmattum Hill, Euroa, 4 January 2020. I can attest to the awesome effectiveness of the aerial fire fighting that suppressed the blaze.

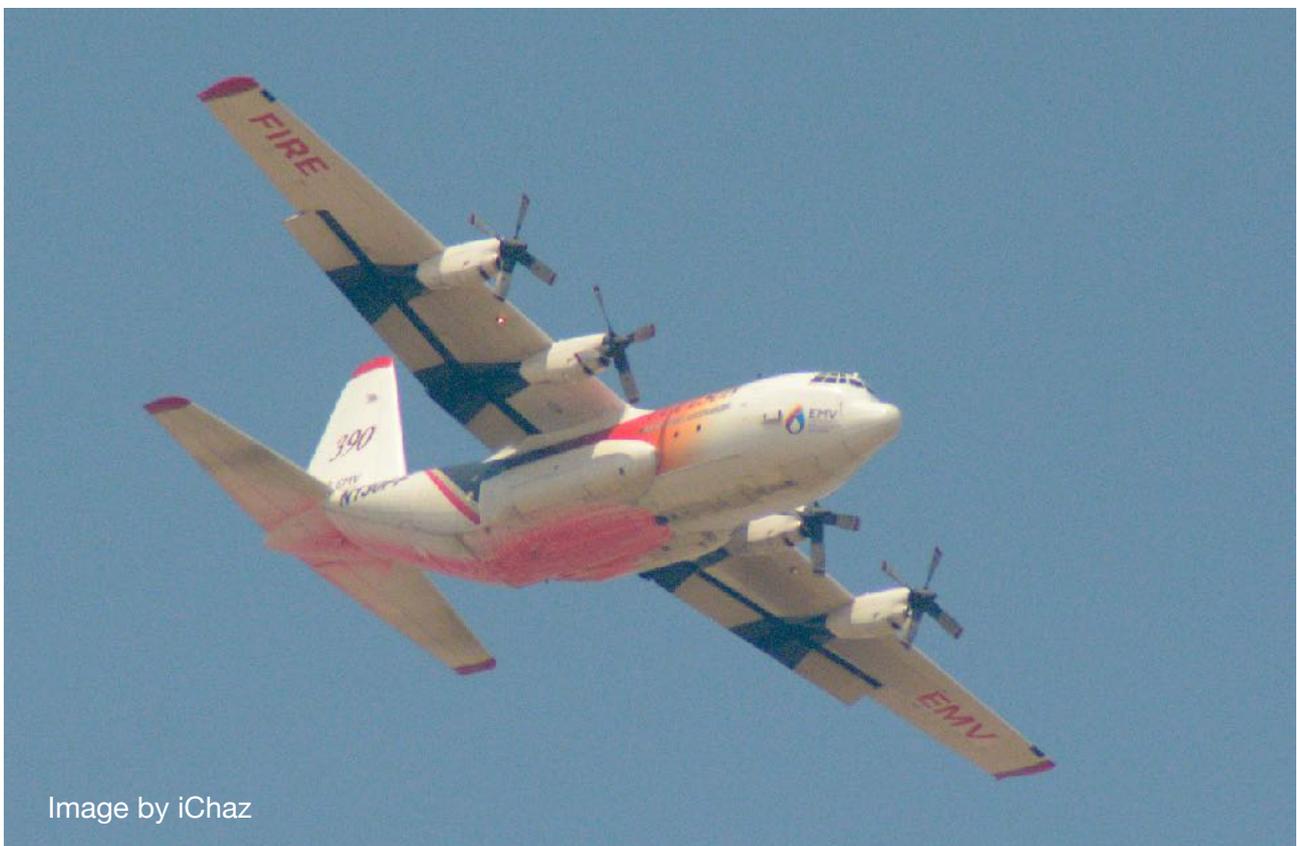


Image by iChaz

Matters for consideration:

1. Effectiveness of emergency management command and control and accountability arrangements in Victoria.

Satisfactory.

2. Effectiveness of Victoria's operational response to the 2019-20 fire season.

Courageous.

The operational response was not able to extinguish fires to the desired degree because the natural forces driving the fires were far beyond anything that human beings could manage.

3. Review of the effectiveness of the declaration of a state of disaster under the Emergency Management Act 1986 – including the appropriateness of supporting legislative and administrative processes, communication, and community compliance.

The declaration of a State of Disaster was appropriate.

4. State evacuation planning and preparedness processes/practices and their effectiveness with an emphasis on remote/isolated communities and Victorian peak holiday season locations.

Not qualified to comment.

5. The timeliness and effectiveness of activation of Commonwealth assistance, and Commonwealth resource availability.

The activation of Commonwealth assistance, including the defence forces, would have been more effective if that activation had taken place earlier in the fire season.

The defence forces are well trained in evacuation techniques, but I wonder if they would benefit from more training in fire suppression.

6. Preparedness ahead of the 2019-20 fire season; including the effectiveness of regional emergency management work undertaken to inform and educate the community about the coming season, community engagement, impact of lengthening fire seasons, and any relevant legislation, policy and practice.

I witnessed considerable efforts by the authorities and the media to educate the public in fire prevention, protection from fire, and evacuation procedures.

I found that the mobile phone app *VicEmergency* was effective, accurate and helpful at all times. It remains so, and should continue.

The role of the Australian Broadcasting Corporation (ABC) in fire education and community information was outstanding and exemplary.

7. Consider all challenges and implications for bushfire preparedness arising from increasingly longer and more severe bushfire seasons as a result of climate change.

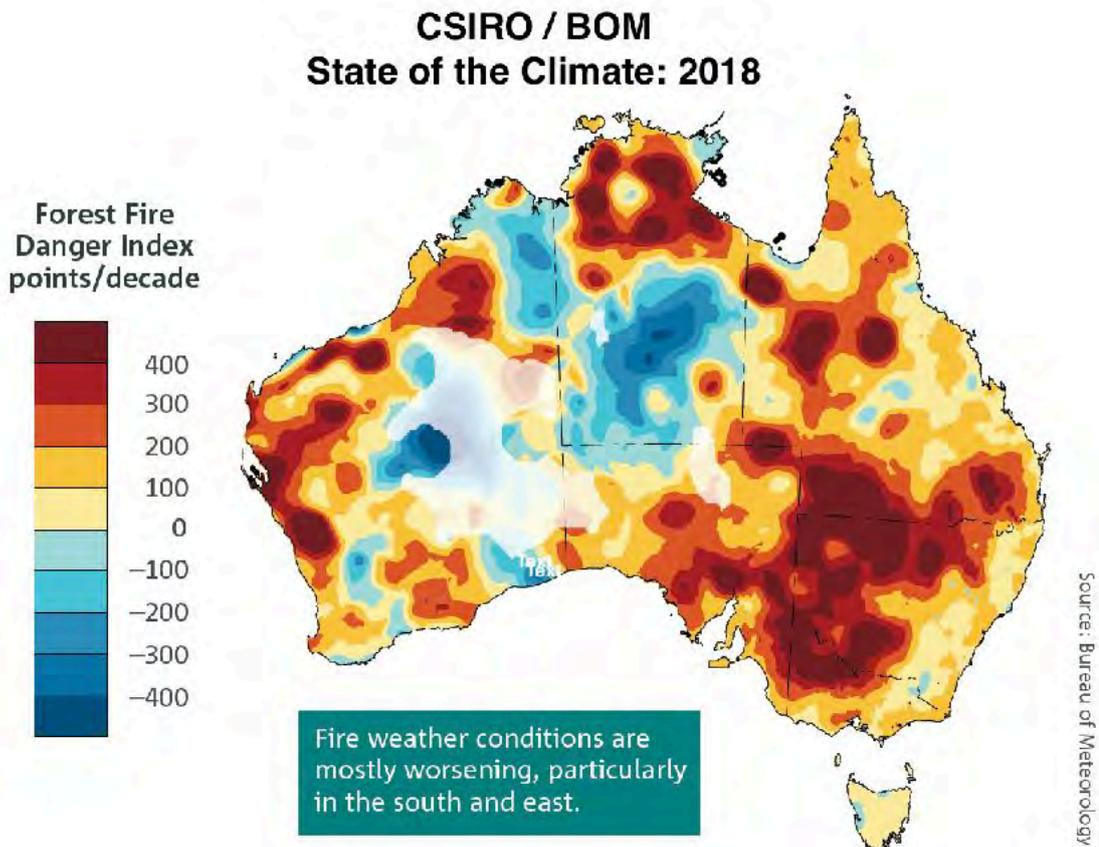
Many times I heard it said in the media and in numerous conversations that “this fire season is unprecedented” and “nobody saw it coming”.

These assertions are not supported by the facts.

There were serious bushfires in Victoria in 2003, 2006 and 2009; the later giving rise to a Royal Commission. See http://royalcommission.vic.gov.au/finaldocuments/summary/PF/VBRC_Summary_PF.pdf

“Nobody saw it coming...” Also incorrect.

The Bureau of Meteorology (BOM) and the Commonwealth Scientific and Industrial Research Organisation (CSIRO) have been tracking a “Forest Fire Danger Index” (FFDI) for four decades.



Trends from 1978 to 2017 in the annual (July to June) sum of the daily Forest Fire Danger Index—an indicator of the severity of fire weather conditions. Positive trends, shown in the yellow to red colours, are indicative of an increasing length and intensity of the fire weather season. A trend of 300 FFDI points per decade is equivalent to an average trend of 30 FFDI points per year. Areas where there are sparse data coverage such as central parts of Western Australia are faded. See <https://www.csiro.au/en/Showcase/state-of-the-climate>

The important point about the chart above is that it is *history*, not a forecast.

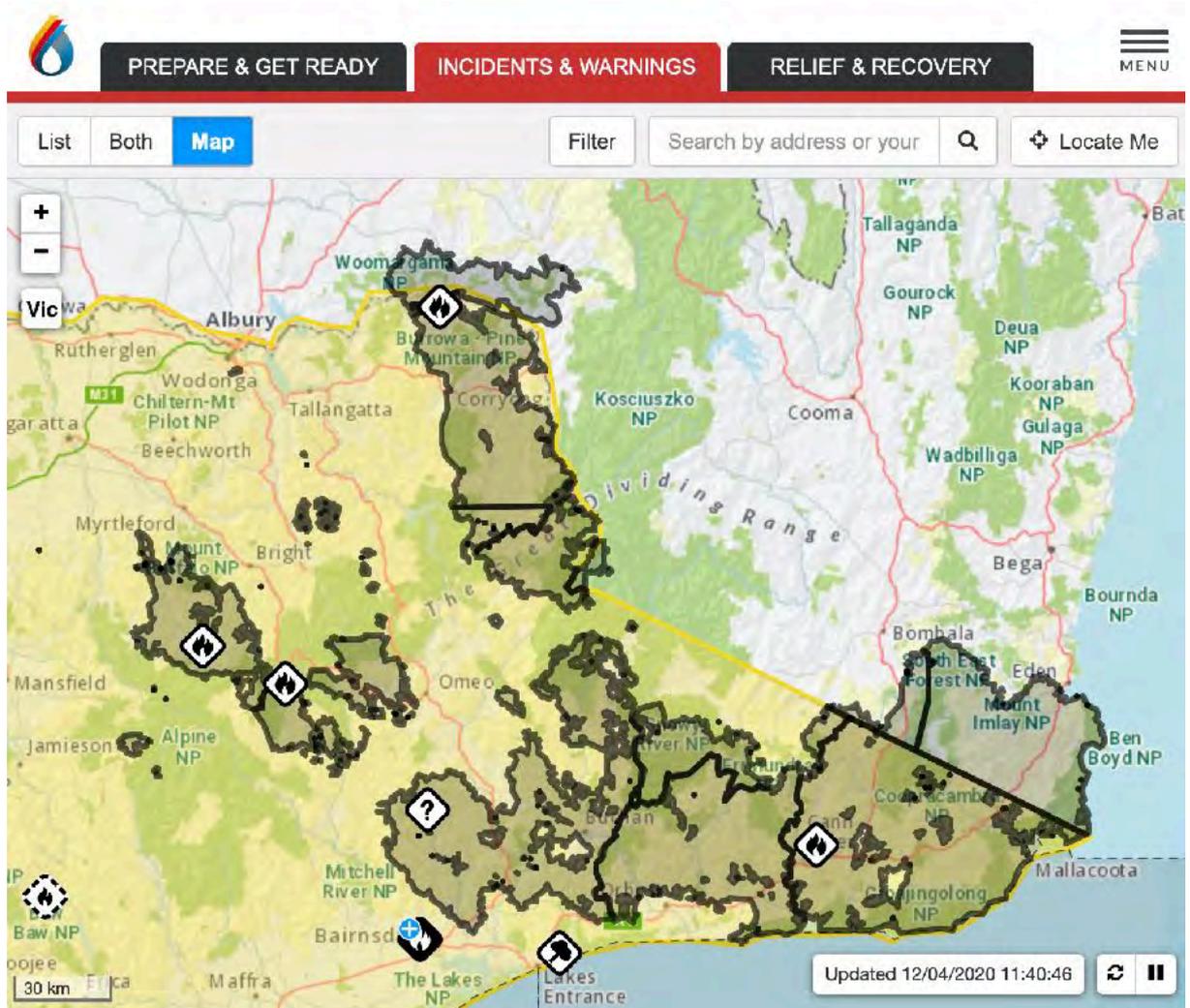
Most of the areas burnt in this summer’s fires were in the “yellow” zones rather than the highest risk “red-brown”. What happens next summer ?

The CSIRO/BOM report shows that global warming is playing an important role in increasing the risk of bushfire, especially in the south east region of Australia.

Reference: CSIRO & BOM *State of the Climate* December 2018.

See page 5 in <https://www.csiro.au/en/Showcase/state-of-the-climate>

This map from VicEmergency shows the extent of this summer's bushfires in Victoria and southern NSW.



The following video shows the speed with which the bushfires consumed the forests of eastern Victoria.

See <https://www.youtube.com/watch?v=tCYUxle11Kk>

All the scientific evidence is consistent with the proposition that anthropogenic greenhouse gas emissions, carbon dioxide in particular, are causing rising temperatures in the atmosphere and in the sea.

See <https://www.csiro.au/en/Showcase/state-of-the-climate>

There has been much discussion about “tipping points” precipitated by global warming. This summer, we witnessed one of those tipping points; the disastrous combustion of our beautiful forests.

“...the massive scale of the recent Australian bushfires goes beyond what any model used by the Intergovernmental Panel on Climate Change (IPCC) has ever simulated – for the present or the future. In fact, one of us (Wolfgang) has published extensively on future wildfires, and his work found that fire activity in parts of south-eastern Australia would likely increase significantly by the late 21st century. In reality, much more widespread fires occurred some 70 years earlier than predicted.” Knorr and Stefan (2020)

See <https://theconversation.com/we-climate-scientists-wont-know-exactly-how-the-crisis-will-unfold-until-its-too-late-133400>

In this respect governments everywhere in the world must redouble their efforts to reduce greenhouse gas emissions, specifically;

- stop the production and combustion of fossil fuels
- close down electricity generation which relies on fossil fuels
- invest in renewable energy
- develop forms of transport which do not use fossil fuels

The government of Victoria has a laudable program which addresses the issues above, but the implementation needs to be faster to help mitigate the risk and severity of bushfires.

See <https://www.climatechange.vic.gov.au/victorias-climate-change-framework>

8. In the context of bushfire preparedness, assess the readiness and responsibilities of statutory agencies, Local Government and State Government bodies.

The authorities were well prepared, but were overwhelmed by natural forces well beyond their control.

9. Review of all opportunities and approaches to bushfire preparedness, including different methods of fuel and land management (for example 'cool burning', mechanical slashing, integrated forest management, traditional fire approaches) to protect life and property as well as ecological and cultural values.

Before European settlement, it was common practice for Traditional Owners to conduct deliberate bush burns that were often 0.1 to 0.5 hectares. These burns were carefully prepared and controlled to encourage or discourage the growth of specific plants, and to drive out food animals with smoke. This is "gardening with fire".



Image by ABC South East NSW: Vanessa Milton

My conversations with Traditional Owners attest that massive landscape scale intense bushfires are not part of the long oral history of their ancestors.

As pre-european Traditional Owners did not have roads, vehicles and aircraft, they did not have the means to escape any fast moving large hot fire. These people would have been killed. But this did not happen.

Landscape scale bushfires are a modern problem.

This is a “whitefella” problem.

Can we return to the controlled burning techniques of Traditional Owners ? The challenges are significant. Land tenure matters are now much more complex. But most significantly, the climate is now much warmer and drier than at any time in thousands of years.

See for example <https://www.abc.net.au/news/2020-01-09/indigenous-cultural-fire-burning-method-has-benefits-experts-say/11853096>

See also <https://www.abc.net.au/news/2020-04-13/how-victor-steffensen-is-fighting-fire-with-fire/11866478>

The effectiveness of modern european-style fuel reduction burning, or prescribed burning has been called into question.

See https://www.theguardian.com/environment/2020/feb/06/hazard-reduction-burning-had-little-to-no-effect-in-slowing-this-summer-s-bushfires?CMP=Share_iOSApp_Other&fbclid=IwAR0T9I_GSAwHljEyhwhqVg68ftacGPg8FtWO0x1BM5U7cj1DJmBSXdasHcw

See also https://www.theage.com.au/environment/climate-change/why-prescribed-burns-don-t-stop-wildfires-2020122-p53t19.html?fbclid=IwAR1gSwapLBK2iI5Z_LiVwAKBeNVO7cMCfdzdC0_8KhH7uEi24GmBD_VqjvM

As a form of “fuel reduction burning”, the dropping of boxfuls of incendiary ping pong balls from a helicopter or drone is about as far away as you can get from the gentle art of “fire-stick farming”.



Image by Brian Myrick / Daily Record

See <https://www.smh.com.au/national/great-balls-of-fire-join-battle-for-the-bush-20090424-ai4q.html>

The bushfire season in south eastern Australia is becoming “end of winter” to “beginning of winter”. Soon it may be too hazardous to conduct any “hazard reduction burns” at all.



THIS IS NOT NORMAL

Longer and hotter heatwaves.

Less rain over southern Australia during the cool season.

Fewer days for bushfire fuel reduction.

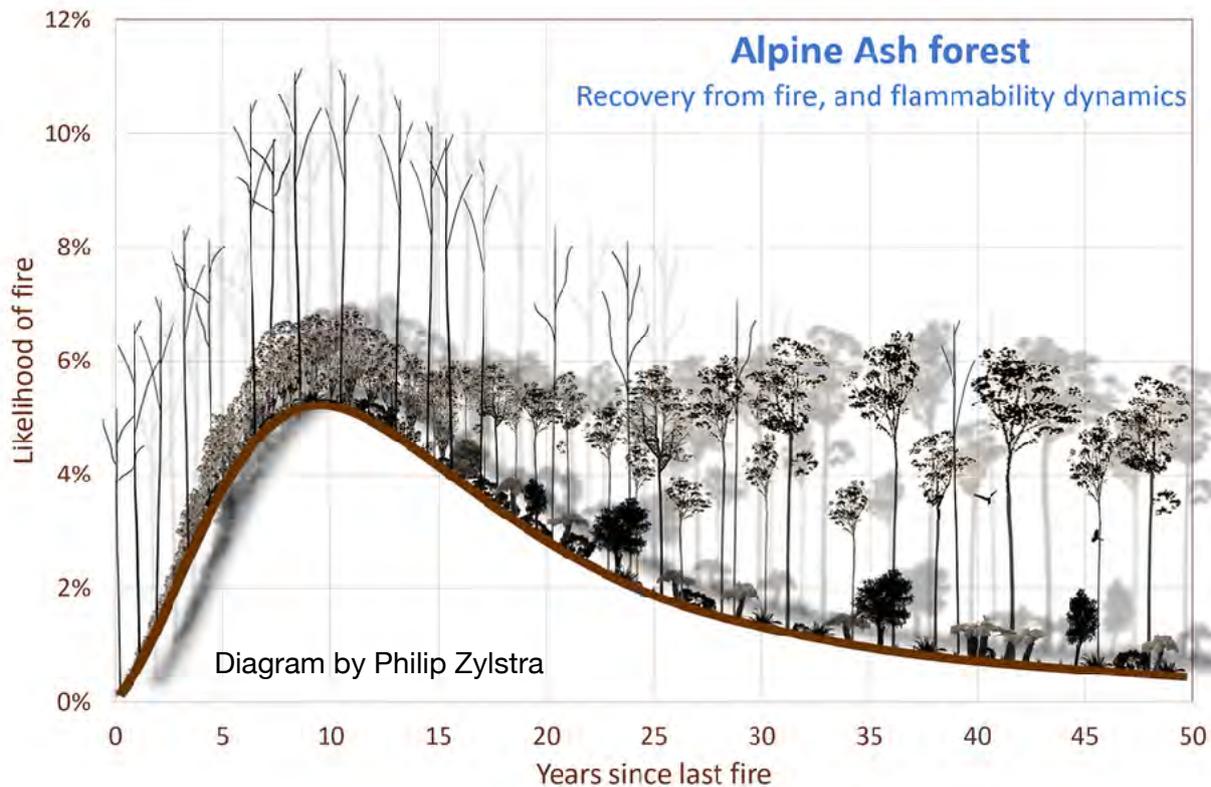
CLIMATE CHANGE IS SUPER-CHARGING THESE MEGA-FIRES.

C CLIMATECOUNCIL.ORG.AU | crowd-funded science information

See <https://www.climatecouncil.org.au/not-normal-climate-change-bushfire-web/>

The matter of “integrated forest management” is the most egregious issue of all.

Our forests are being made more flammable by VicForests cutting down mature trees and replacing them with regrowth that is more combustibile. This must stop.



See <https://theconversation.com/contrary-to-common-belief-some-forests-get-more-fire-resistant-with-age-95059>

To make matters worse, burnt trees are being harvested by VicForests via “salvage logging”; a practice which can severely compromise the ability of the landscape, watercourses and ecology to recover from the trauma of bushfire.

Salvage logging must cease.



Image from ABC News

See <https://www.abc.net.au/news/2020-01-29/logging-bushfire-affected-areas-australia-increases-fire-risk/11903662>

In summary, the VicForests Corporation must be terminated with immediate effect.

For a detailed plan to wind up VicForests and move forward, please see the section “**Beyond VicForests**” below.

10. Consideration of the effectiveness of Victoria’s Code Red day arrangements and their application in practice.

The Code Red Day arrangements are appropriate and effective. Please continue.

11. In considering effectiveness of Victoria’s operational response to the 2019-20 fire season, IGEM should particularly consider:

- effectiveness of the State’s response priorities, including primacy of life
- effectiveness of public information and warning systems, including cross-border coordination and communication
- impact of increasingly longer fire seasons on the ability to prepare, deploy and sustain efforts directed towards emergency events in Victoria
- impact of providing Victorian responder officers to other Australian jurisdictions to assist with emergency events (as early as September 2019 this summer season)
- availability and utilisation of private assets and resources (including plant equipment) to support emergency preparedness and response
- planning and response mechanisms to protect biodiversity threatened by bushfire

Hopelessly inadequate.

A billion animals perished in the bushfires of last summer.

More extinctions can be expected.

Table 1: Species impacted by the current fire extent

Source: DELWP 2020

% of modelled habitat in the current fire extent	Total species	Listed under the EPBC Act**	Listed under the FFG Act*	Listed as Victorian Rare or Threatened species*
Fauna				
Over 95%	1 species	1 species	1 species	1 species
50% or more	17 species	3 species	8 species	11 species
20% or more	87 species	13 species	26 species	35 species
Flora				
Over 95%	4 species	0 species	1 species	4 species
50% or more	168 species	10 species	13 species	162 species
20% or more	689 species	19 species	48 species	397 species

See <https://www.abc.net.au/news/2020-01-31/fact-check-have-bushfires-killed-more-than-a-billion-animals/11912538>

See also https://www.wildlife.vic.gov.au/home/biodiversity-bushfire-response-and-recovery?fbclid=IwAR2outzW1cHRyDtjbzS-iELzSp9Wq0BQ3J64S2uoyC32SSvPV9jRc3hZ_XY

The normal work of VicForests before and after a bushfire, makes a dire biodiversity situation much much worse.



▲ An open letter by a group of forestry and climate scientists calls for logging of native forests to cease to aid in prevention of bushfires and global warming. Photograph: SHARLOCH/Rick Sharloch

See <https://www.smh.com.au/national/don-t-see-how-we-can-justify-it-bushfire-scientist-wants-immediate-end-to-logging-20200308-p54828.html?fbclid=IwAR37koqmyyER64QaMdaPywszjZNyVNgE69GtswVPOeN1JK-EB4NDWLAwwXQ>

See also https://www.theguardian.com/environment/2020/feb/26/call-to-end-logging-of-protective-native-forests-in-wake-of-bushfire-crisis?CMP=Share_iOSApp_Other&fbclid=IwAR2tvsr_C0dPdhNr56W-_jihiwgGuuVdu5EKtHTWpjJm5U0snwZbZsrmscw

See also https://www.theage.com.au/politics/federal/113-animal-species-requiring-urgent-action-after-bushfires-2020211-p53zsu.html?fbclid=IwAR3_0lyXgE7KjGHiQStF24g-r5HriJ11augXcbGkaJ-VHQZ1ifRRbe6i2gc

There are no rational grounds for exempting VicForests from the Environment Protection and Biodiversity Conservation (EPBC) Act (Commonwealth).

See <https://www.environment.gov.au/epbc/about>

VicForests normal work is contrary to Victoria's Biodiversity 2037 Plan.

See <https://www.environment.vic.gov.au/biodiversity/biodiversity-plan>



With regard to biodiversity, the “modernised” Regional Forests Agreements are entirely counterproductive because they allow the continuation of logging of native forests. The RFAs do not prevent salvage logging.

See <https://www2.delwp.vic.gov.au/futureforests/what-were-doing/victorian-regional-forest-agreements>

**Victoria's biodiversity cannot be protected
until VicForests ceases to operate.**

- effectiveness of the existing workforce model to support response, relief and recovery.

My general comment regarding all of Criterion 11 is that (with the notable exception of VicForests) all the authorities and organisations that work to keep us safe from bushfire do their utmost. Frankly, we can hardly ask more of them. They already try well above and beyond the call of duty. They work with tenacity and courage, and they work to exhaustion.

But it is not enough, because the forces they are pitted against are so overwhelming and capricious. We must recognise that fact.

The long term remedies for bushfire are all about prevention.

And prevention actions must take strong heed of the fire-stick farming practices of Traditional Owners.

12. Review support available to staff and volunteers in terms of mental health and wellbeing.

Not qualified to comment.

13. Consideration of the adequacy of existing administrative and funding mechanisms in place at a state level to support the operational response efforts.

Not qualified to comment.

14. In considering the timeliness and effectiveness of activation of Commonwealth assistance, and Commonwealth resource availability, IGEM should particularly consider:

- effectiveness of current national resource sharing arrangements when multiple and simultaneous fire events are occurring
- effectiveness of existing governance arrangements supporting access to Commonwealth and State air fleets
- use and integration of Australian Defence Force assets into Victoria's emergency response and relief operations.

The activation of Commonwealth assistance, including the defence forces, would have been more effective if that activation had taken place earlier in the fire season.

The defence forces are well trained in evacuation techniques, but I wonder if they would benefit from more training in fire suppression.

Beyond VicForests

Bushfires are being made worse by the logging and regrowth of native forests by VicForests.

We are at a critical point in the history of forests in eastern Australia.

A combination of drought, bushfire, global warming, floods, and logging threaten to convert our beautiful Australian forests into moonscapes.

Misinformed, compromised, and supine governments are failing all of us, especially future generations.

No government should be in the business of cutting down forests.

Every government should be in the business of protecting forests.

A state owned logging corporation is an anachronism.

We need immediate action to counter this madness and save our ecosystems.



Image by Lea Jellinek

See <https://aboutregional.com.au/salvage-logging-could-destroy-habitat-for-vulnerable-animals-expert-warns/>

See also https://www.theage.com.au/environment/conservation/victoria-s-plans-for-logging-in-bushfire-zones-grossly-irresponsible-20200401-p54g0t.html?fbclid=IwAR3zyCns7Ly9s0aG_5XjIAyIWDxRkYqv8clA2WBqT6mhq6mQbnRMksWgYkI

Objective: Wind up the VicForests Corporation forthwith.

Strategies: Do not become embroiled in negotiations about “a future” for VicForests.
The Corporation has no future.

Actions to be undertaken by government

1. Formally wind up the VicForests Corporation, without delay.
Terminate all VicForests staff, with full entitlements.
2. Cancel all remaining contracts between VicForests and their contractors, suppliers and customers on the basis of “force majeure” arising from this summer’s bushfires.
See https://www.abc.net.au/news/2020-02-06/logger-contracts-cancelled-by-vic-forests-due-to-gippsland-fires/11937932?sf229664644=1&fbclid=IwAR044xzgFwpkc7RBdz2sVVrBJDhu8-SY1eB0oKBCp31_FvmBpxEuNAkPV2o
3. Stop the "salvage logging" atrocity now.
4. Cancel all Regional Forests Agreements.
See <https://www2.delwp.vic.gov.au/futureforests/what-were-doing/victorian-regional-forest-agreements>
5. Repeal the Wood Pulp Agreement Act and all other related regulations.
See http://www5.austlii.edu.au/au/legis/vic/consol_act/fpaa1996309/sch1.html
6. Without delay, re-employ the entire VicForests workforce through the Biodiversity 2037 Implementation Framework. The re-employment program to be extended to all former VF contractors and sawmillers who may wish to participate.

Effectively, the forest destruction workforce is transformed into the forest reconstruction workforce.
See <https://www.environment.vic.gov.au/biodiversity/Implementing-Biodiversity-2037>
7. There is a new program of government incentives for people and companies to exit the native forest timber industry. It is called the “Victorian Forestry Plan” (2020). Apply that program now, making all of the incentives available from *April 2020* rather than 2024. Increase the value of all the incentives to double or more.

See <https://www.vic.gov.au/sites/default/files/2019-11/DJPR-Inclusion-Forestry-Plan-1.pdf>
8. Ensure that ALL the VicForests-owned timber harvesting machinery is sold or scrapped. Provide incentives to machinery dealers and impose disposal deadlines. Extend this program to all timber industry contractors who find that they now have excess machinery.
9. Initiate research projects aimed at finding ways of making paper, cardboard, fibreboard and other fibre related products from annual crops, from crop wastes, and from microbiological sources of cellulose. Export these products instead of wood chips.
10. Initiate research projects aimed at reduction of paper and wood consumption.

11. Initiate research projects aimed at finding replacements for paper and other wood products with more environmentally benign materials.

Here are some examples;

- Wooden pallets should be banned; they should be replaced by returnable stillages made from recycled metals, plastics, and composites.
 - Toilet paper should be made only from recycled paper, bamboo, or other annual crops grown on agricultural land.
 - House frames and roof trusses can be made of (recyclable) steel.
 - Furniture can be made from a wide range of non-wood materials including recycled plastics.
12. Where there is no substitute for wood, grow plantation timber on agricultural land.
 13. Government to enact the above changes through legislation in Parliament, in order to make the changes as irreversible as possible.
 14. Continue, and accelerate actions to reduce net emissions of greenhouse gas emissions into the atmosphere.
 15. Monitor and measure progress, including biodiversity and economic performance. Benchmark against the Biodiversity 2037 Plan and other criteria. Publish often.

Second thoughts ?

In case there is any reluctance about winding up VicForests, it is noteworthy that VicForests trashes about 9.5 hectares of native forest each working day, or about 3,000 hectares per year.

See <https://www.abc.net.au/news/2019-02-20/fact-check-five-mcgs-of-native-forests-logged-in-victoria/10780846?fbclid=IwAR389qLAAaDK8ByDfnWaNApn05qViDb99XT3uo2mf8EpUUFNU5JIUpNGEU>

VicForests is practically bereft of social licence.

Question 7. What could be done to alleviate your concerns and improve the things you most value about our forests?

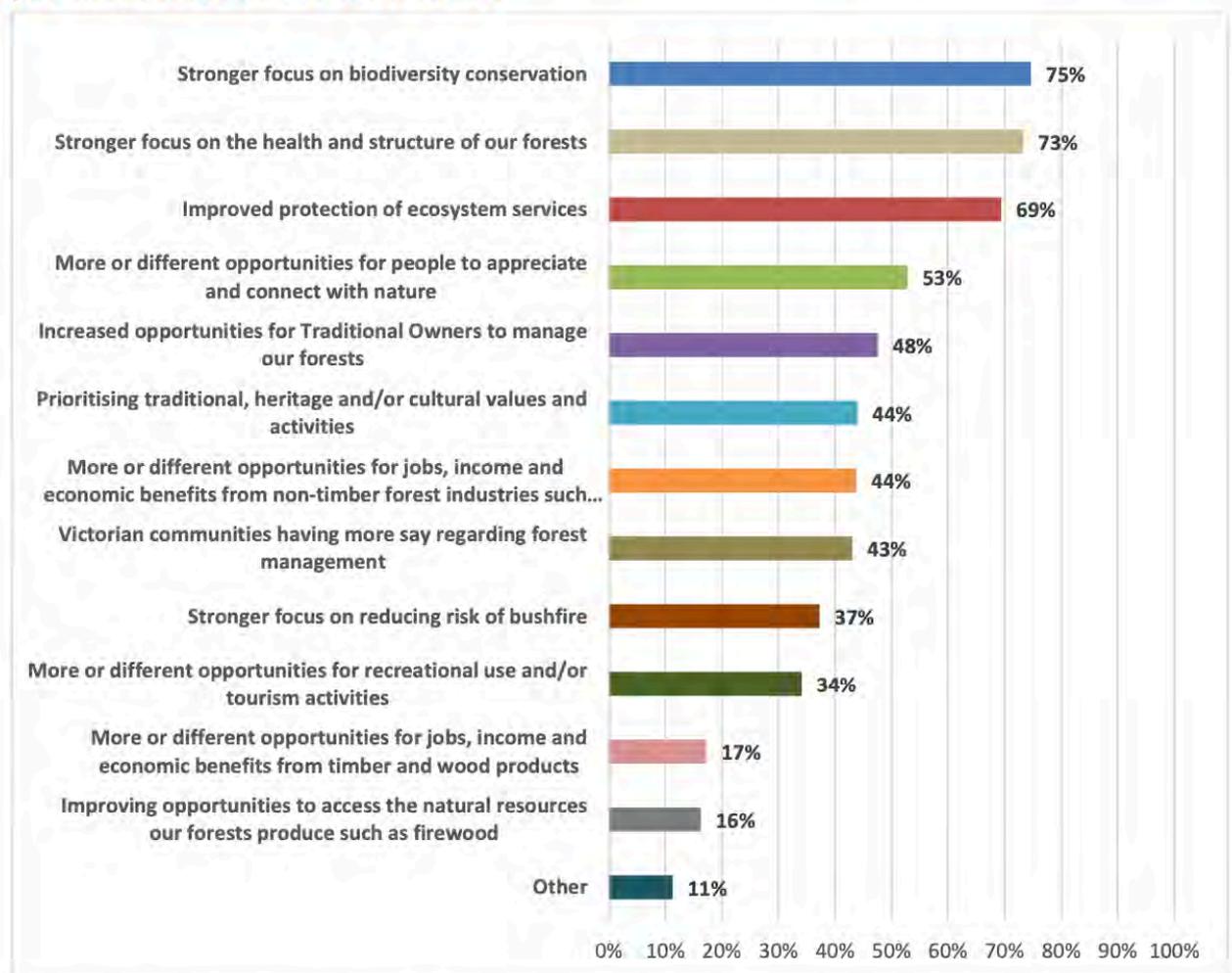
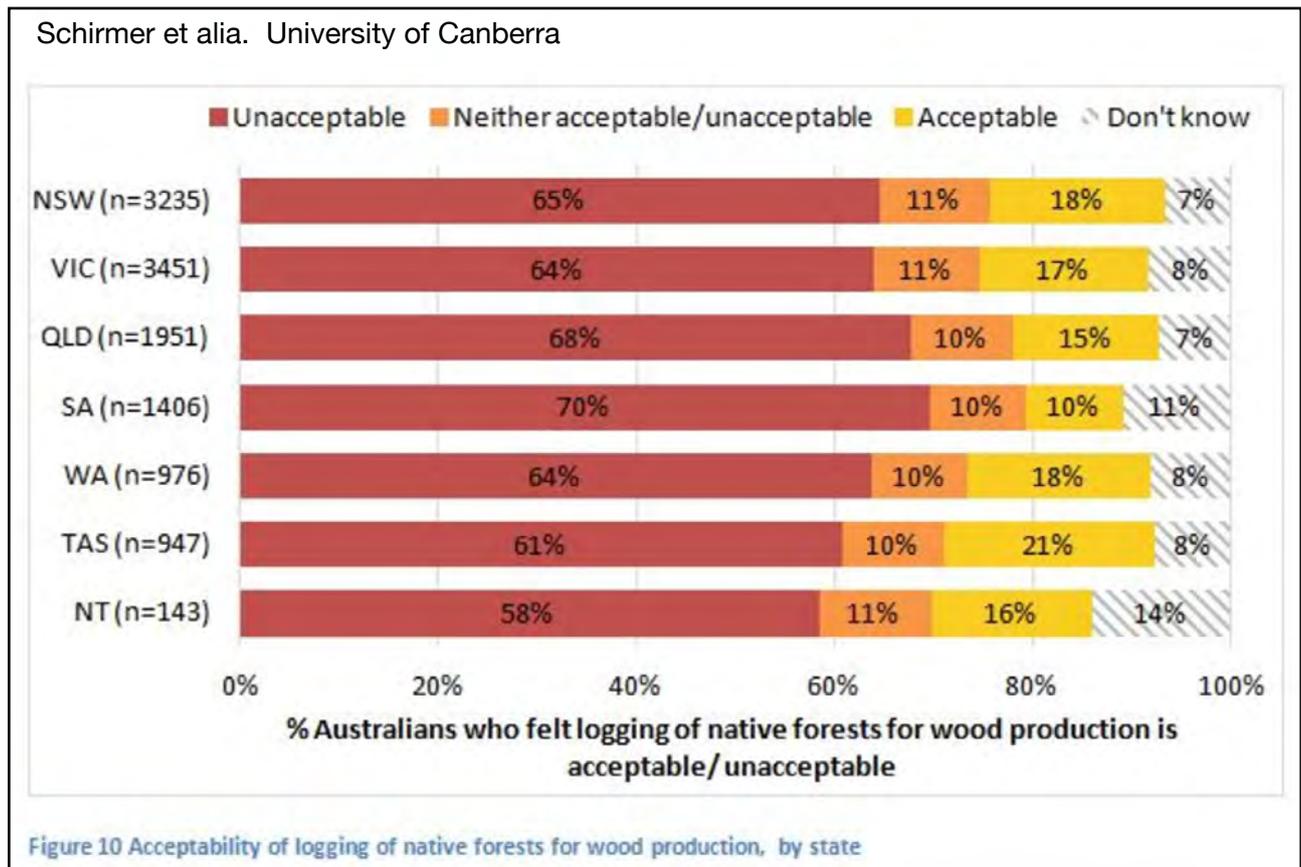


Figure 7: What could be done to alleviate your concerns and improve the things you most value about our forests? Number of respondents answered: 2764

(Please note these percentages will not add up to 100% because respondents could choose multiple responses)

See page 31 in https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/4915/6438/3710/FutureOfOurForests_FeedbackReport.pdf

The dearth of public support for native forest logging extends beyond Victoria.



See <https://www.smh.com.au/environment/sustainability/bush-turns-its-back-on-support-for-logging-native-forests-20181113-p50frc.html?fbclid=IwAR3gbeXNDMGSSB0RCeMlcy1kxD51HT7u7EYPtJNg5U7jbclspxoB1g9bHjQ>

And ...

The immediate cessation of native forest logging by VicForests could save taxpayers over \$190 million, over ten years.

Table A2 Cumulative impacts (a)

(\$ million)	2019- 20	2020- 21	2021- 22	2022- 23	2023- 24	2024- 25	2025- 26	2026- 27	2027- 28	2028- 29	2029- 30
Revenue	-3.4	-12.1	-21.4	-31.3	-41.9	-53.0	-64.7	-77.1	-90.0	-103.6	-117.7
less Expense	2.6	-9.2	-11.4	-16.0	-50.7	-87.8	-127.3	-169.2	-213.6	-260.4	-309.6
Change to net operating balance^(b)	-6.0	-2.9	-10.0	-15.3	8.8	34.8	62.6	92.2	123.6	156.9	191.9
less Asset	-	-	-	-	-	-	-	-	-	-	-
less Finance leases	-	-	-	-	-	-	-	-	-	-	-
Change to net position^(c)	-6.0	-2.9	-10.0	-15.3	8.8	34.8	62.6	92.2	123.6	156.9	191.9

Source: Parliamentary Budget Office.

See https://www.theguardian.com/environment/2020/apr/13/ending-logging-in-victoria-now-would-save-taxpayers-192m-budget-office-estimates?CMP=Share_iOSApp_Other&fbclid=IwAR1Us5aHsCNSygY6Acf8dUddJSI1YBhDjedHK0FksxzzYAWGZhij_Ykl2g

See also <https://sway.office.com/cQXoiKW0HHNL6mI?fbclid=IwAR1QJbkVOfc8MoGjQ0gXyZuz5UvUaqszXYawF2ZBxyso91aF-IQTZ-57vvM>

Closing remarks

I wish to thank everyone who helped mitigate the bushfires of the summer of 2019 / 2020.

My sympathies are with all those who were killed, injured, and traumatised by the bushfires.

I am deeply saddened by the damage to our natural heritage.

I wish this Inquiry well in its deliberations.

This submission was prepared by

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Grad. Dip. Education.

Forests Forever Films: <https://www.facebook.com/ForestsForeverFilms/>



13 April 2020

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