



28 July 2014

legislation@dfes.wa.gov.au

Review of Emergency Services Acts
PO Box P1174
Perth WA 6844

**Concept paper for the Review of Emergency Services Acts:
Fire Brigades Act 1942, Bush Fires Act 1954, Fire and Emergency Services Act 1998
Submission by Urban Bushland Council WA Inc.**

Contact: ubc@bushlandperth.org.au tel. 9420 7207 PO Box 326, West Perth WA 6872

The Urban Bushland Council is an association of some 70 community groups with the common interest in the conservation and management of urban bushland. 'Urban' bushland includes all the native vegetation in the Perth- Peel Regions as well as bushland associated with towns in the south west region of WA. The Council has been active for over 20 years, has held conferences with printed proceedings, and has conducted activities and major projects in community education and science on various aspects of bushland management. This has included fire management and arson prevention presentations and seminars in conjunction with FESA/DFES staff - especially Ralph Smith, Craig Waters and their staff and the JAFFA program.

1. Consultation

Given this engagement with fire agencies over the years, we are disappointed that to date there has been no consultation in the Review process with the Urban Bushland Council and the myriad of community Friends groups many of which are our members. We note also that there has been no consultation with the EPA or the academic scientific community who have studied and documented the impacts of fire on our unique Banksia woodlands, wetlands, and coastal heathlands of the Swan Coastal Plain and south west of WA.

We recommend that the consultation process includes experts such as Professor Stephen Hopper (UWA), Professor Pierre Horwitz (ECU), Dr Kingsley Dixon (BGPA), Dr Don Bradshaw (UWA), Hans Lambers (UWA), Professor Richard Hobbs (ex CSIRO, now UWA), Assoc Professor John Bailey (Dean Environmental Science Murdoch), Giles Hardy (Murdoch).

2. Protection of biodiversity

Protection of life and property should also include protection of biodiversity. 'Property' should include living things such as native vegetation, not just constructed buildings and fences. 'Life' should include native animal life as well as human life. Humans are dependent on trees and plants for supplying oxygen and other health and aesthetic services, so it is only logical for protection of biodiversity and functioning ecosystems to be part of what should be protected. Emergency services are needed in the events of flood, storm, earthquake and fire and all of these need consideration in the review as each can have catastrophic impacts on humans, buildings and the natural environment.

Reference to past bushfire research in forested areas of the SW by Burrows and others is not applicable to the Banksia woodlands of the Swan Coastal Plain. Arguments have been made that past research on forest ecology under frequent fire regimes indicated that the number of species did not change, only the number of individual plants changed. This should not be used as a defence of

frequent prescribed burning on the SCP as (a) the research was for SW forest environments; (b) it has not been clearly stated if new weed species were introduced under these regimes; and (c) a significant change to the numbers of individual plants has a significant effect on the ecology of an area, affecting species that feed on and shelter within these plants. Dismissing the negative effect of frequent burning on our bushland is wrong. Importantly, it must be acknowledged that our environment is a known biodiversity hotspot with complex and changing environmental values, both temporally and spatially. Great care and caution must be taken to ensure the biodiversity is not significantly degraded due to too frequent burning. It must also be recognised that there is a compounding effect of increased burning with the many other threatening processes on SCP biodiversity, such as land clearing for development, dieback, ground water abstraction, weed invasion and acid sulfate soils etc.

3. Primacy of new Emergency services Act not supported.

The preferred option to give primacy to the new ES Act is not supported. The narrow focus of burning and excessive fuel load reduction without consideration of biodiversity implications and ongoing bushland management is unacceptable. The Environmental Protection Act and Wildlife Conservation Act (and the promised new Biodiversity Conservation Act) must be allowed to properly protect our unique and species rich biodiversity.

4. Prescribed burning on Swan Coastal Plain

The Urban Bushland Council does not support the practice of prescribed burning (or mosaic burning as it may be termed) on the Swan Coastal Plain because:

1. Most bushland areas are burnt too often, especially in the urban/peri urban areas leading to degradation and loss of species. Re-seeders may need 30 years before they mature and set enough seed. Other plants such as Xanthorreas should never be burnt - their dry skirts are destroyed and these are essential habitat for many fauna species such as the Honey Possum. These animals and others are killed by fire.
2. Wetlands should never be burnt. Peat takes hundreds of years to accumulate and if these peaty wetlands are burnt, fires are uncontrollable and can continue underground for weeks with devastating outcomes. An ill considered prescribed burn in Paganoni Swamp resulted in the invasion of a number of new weed species that required over \$70,000 of government funded weed control work in the first year following the fire (Kate Brown pers.comm, DEC).
3. Weeds - not only but especially grassy weeds invade Swan Coastal Plain plant communities after fire, as they germinate and grow faster than most native plants, and there is a weed seed bank in most areas, especially those which have been disturbed. Burning increases grassy and other weed invasion and thus increases fire risk - especially along disturbed roadsides and edges. Thus careful selective control of grassy weeds (without soil disturbance) - which otherwise grow and dry out and become an increased fire hazard - should be the priority for local government and land managers (and not prescribed burning).
4. Fire removes the soil surface organic matter - which is needed to retain buffering capacity and supply of nutrients and microbes, fungi and other recyclers and decomposers - ie the natural processes of cycling of nutrients. In Bassendean sands especially - where buffering capacity is limited, removal of the organic matter by fire exposes these sands to acidity. They become acidic and this is exacerbated by falling groundwater tables. This is now a major issue which requires much more attention from State agencies - DFES, DOP, DPAW, Water Corporation, Main Roads, Western Power, DPC. At the recent National Acid Sulfate Soil conference held in Perth, the extent, very high costs of

remediation and management of acid sulfate soils on the Swan Coastal Plain and other coastal locations around Australia were boldly presented. The conference was supported by DER, especially through Dr Stephen Appleyard.

5. Fire kills the invertebrates, reptiles - herpetofauna, microbes and fungi which provide pollination and cycling processes as above. It takes some years for these natural decomposers to build up again, but in a fragmented landscape, many species may not be able to recolonise, and the biodiversity will be significantly degraded.

6. Burning by authorities sends out the wrong subliminal social message to arsonists and potential arsonists: *'if the government burns the bush, I can do it too'*. The major problem is arson and this needs to be addressed as a priority - eg by more focus on the 'Juvenile and Family Fire Awareness' (JAFFA) program (by DFES) and by educating young kids, especially boys about fire. Kids need to learn and experience and respect fire in controlled conditions - eg by making camp fires in winter and cool conditions to 'boil the billy' Many juveniles will be tempted to experiment with fire if they have not been taught about it and have not learned how dangerous it is. It is somewhat instinctive for young males to light fire - so if they are not taught they may experiment in a dangerous way.

7. Our vegetation is flammable - and so are our cars - but we do not get rid of them. Clearing undergrowth only degrades bushland.

In summary, on the Swan Coastal Plain, prescribed burning is counterproductive and actually increases fire hazard due to invasion by grassy weeds such as Veldt grass which dries out in summer.

The Urban Bushland Council is aware that the new DFES guidelines for fire risk mitigation are being seriously mis-interpreted by some parties. At our recent Q&A Panel discussion on Bushfire Risk management held 21 July, the following summary was made:

- Draft Statement of Planning Policy (SPP) 3.7 is intended to apply to new planning decisions (zoning, subdivision & development approvals). There was some concern that the policy was being over zealously applied to existing housing and new development near bushlands within highly developed suburbs. The point was made that this should not be the case. Proper risk assessment needs to be done.
- DFES BPZ Standard guidelines do not promote total tree removal within the BPZ. However due to the diagrams published in interpretive brochures including by local governments, the guidelines are being mis-interpreted. The most worrying diagrams show 20 m clearing of all vegetation around buildings, including shrubs and trees, which if applied strictly according to the diagrams would render our leafy bushland suburbs effectively clearfelled. This would be devastating for the area's biodiversity, shade effect, weed invasion, soil erosion and housing prices. Significant, decisive action needs to be taken by government agencies to ensure the BPZ Standard is communicated properly to the community and to local government authorities.
- Weedy areas including weed infested bushland regenerates a high ground level fuel load within 12 months of fuel reduction burning. Weed management must be a key part of managing fuel loads in these areas.

Action called for:

- Better public information and an education process for local governments on the DFES guidelines is required
- Appropriate risk management should be applied, not risk aversion
- There needs to be an acknowledgement of the need to balance landscape values with fire risk management. The only way that this can occur is if relevant research is carried out and evidence-based policies are developed.

5. Arson

We submit that there should be much more focus on the prevention of fire ignition. Most bushfires in the Perth - Peel regions are lit by humans either accidentally by inappropriate activities such as use of angle grinders adjacent to dry grass in hot windy weather, or most commonly by arson. Excellent initiatives such as the JAFFA program need considerable expansion as well as other effective experiential programs for young males that teach them to respect fire. Local firewatch programs, use of cameras at key sites, and community awareness raising to report suspicious activities are all needed.

Representatives of the Urban Bushland Council would welcome the opportunity to discuss the above matters and others with you.

Yours sincerely

[C Mary Gray](#)

President

Urban Bushland Council WA Inc.

PO Box 326 West Perth WA 6872
phone 9420 7207

ubc@bushlandperth.org.au

www.bushlandperth.org.au