

# HAMILTON FIELD NATURALISTS CLUB



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## Victorian Bushfires Royal Commission Implementation Monitor

Attention –: Mr Neil Comrie AO APM

Dear Mr Comrie

Community groups such as ours (Hamilton Field Naturalists Club) are dismayed by the prospect of a significant negative impact on Victoria's biodiversity arising from the Victorian government's adherence to a blanket annual 5% planned burn target of Crown lands in Victoria. We see huge areas burned in areas that have no significant fire danger to people and private property – as in the Mallee and Big Desert – fires that serve little purpose other than to boost the State's target burn area in lieu of areas where there are real hazards but where no action has been taken. That exercise ignores impacts on threatened species that are supposed to be protected, as outlined in the attached HFNC response to the draft 2013-14 FOP for Wimmera Fire District.

DEPI has failed to produce an annual report on the impacts of the burn program on Victoria's biodiversity, as required in recommendation 57 of the Victorian Bushfires Royal Commission. What, for example, has been the impact of the enormous (many thousand hectares) planned burns on the Malleefowl? These fires are lit in the hot, dry conditions of autumn and almost always seem to escape, burning even more of the mallee. The Malleefowl require areas unburned for more than 20 years in order to find enough litter to provide the necessary fermentation heat in their nest mounds. On present trends there will be no suitable areas left inside 10 years and that particular species – and others – will be truly endangered in Victoria.

It is an absurdity to expect all species of flora and fauna in vastly different habitats to persist under a fire regime that is regimented at 10 years or less. Yet, that appears to be what is now the policy.

Under the 'landscape' prescribed burn approach, where thousands of hectares are now ignited in the one burn, a sizable portion of unburned vegetation is hoped to result by chance. We have seen little evidence of that happening. There is apparently no planned 'mosaic' of unburned vegetation that will assist recolonisation of the burned areas by fauna.

We are disillusioned with the protocols around the public consultation process in relation to Fire Operations Plans. DEPI ignores concerns regarding the adverse effects of inappropriate planned burning activities on biodiversity. It is all about a 5% target for the State and a blanket fire cycle of 10 years or less, if implemented. There is no feedback, and no discussion. As stated in the attached HFNC response to the draft 2013-14 FOP for Wimmera Fire District, we do not think that any submission we have made over many years has received any attention. No issues that we have brought to the attention of the DEPI fire operatives have been acted on to reduce adverse environmental impacts. We are now disinclined to continue commenting on the draft FOPS because the so-called consultation process is manifestly a waste of time and apparently never meant to be a genuine exercise.

We are also extremely concerned at the current tactic of falling any tree with hollows that is perceived to be at risk of catching fire in a planned burn, rather than trying to prevent such trees from catching fire. Raking away the branches and litter around the base of such trees would not be more expensive or time-consuming and would save the trees which play a vital role for the reproduction and survival of at least 100 species of birds, mammals and reptiles. The present tactic is biologically reprehensible and it is astonishing that DEPI would even consider, let alone condone, such a process.

Yours sincerely

P R Bird  
Secretary  
Hamilton Field Naturalists Club