



HAMILTON FIELD NATURALISTS CLUB

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To:
The Hon. Gavin Jennings, MLC
Minister for Environment and Climate Change
Level 22, 50 Lonsdale Street
Melbourne Victoria 3000

Cc: Ian Voigt, DSE Ballarat, Geoff Evans, DSE Horsham, Graham Parks, PV Halls Gap, Rob Gerrand, Chairman PV

4th April 2008

HFNC is very concerned about the response provided by DSE (10 December 2007 Ref.: DSE047925) to the objections we raised in the submission re: 2007-10 Fire Operation Plans for the Wimmera (28 August 2007) and subsequent correspondence relating to the Grampians (Gariwerd) National Park (12 November 2007).

Our concern is that the political pressure for burning the areas of bushland that escaped the Grampian fires of January 2006 has resulted in hasty planning decisions that will threaten the survival of endangered fauna (particularly the Long-nosed Potoroo and Southern Brown Bandicoot) that have sought refuge in those blocks. We are utterly dismayed that DSE/PV has apparently abandoned scientific principles, legislations and management directions in order to accommodate the vociferous views of an ill-informed minority group whose sole aim is to burn the Grampians as often and completely as possible, allegedly to protect private property.

In brief, our concern is that approximately 70% of the Grampians landscape has been burned over the past 10 years and the plans for 2007-10 are to burn much of the remaining unburned areas adjacent to the areas razed by fire in 2006 (details are presented in the [Appendix](#)). **We strongly recommend that plans to burn large areas adjacent to those burned recently in wildfires be re-scheduled by at least 5 to 10 years and their size reduced**, in order that the fire operation plans for 2007-10 conform to Victoria's legislative and biodiversity management goals that endangered fauna not be critically affected.

The legislations, management directions and code of practice that are relevant to this case include:

- **Flora and Fauna Guarantee Act 1988** - habitat must be protected when planning fuel-reduction burns in areas that serve as major refuges for populations of endangered species displaced by recent fires. Known unburned refuge habitat for the Long-nosed Potoroo and Southern Brown Bandicoot must be protected under the provisions of the F&FG Act and the EPBC Act.
- **National Parks Act 1975** - managers of areas under this legislation are required to fulfill their obligations with a clear objective **to protect and preserve bio-diversity**.
- **Victoria's Biodiversity Directions in Management** - *'The goals for biodiversity management are to ensure that, within Victoria, the present diversity of species and ecological communities and their viability is maintained or improved across each bioregion'*.
- **Code of Practice for Fire Management on Public Land 2006 section 1.10.5 Environmental management principles** - *'Fire management must be planned and conducted in an environmentally responsible manner according to the following principles: fire regimes and fire management activities to be appropriate for maintaining and enhancing the vigour and diversity in populations of species and communities of the State's indigenous terrestrial and aquatic flora and fauna'*.

We respectfully request that you direct the Departments and Authorities concerned to adhere to the legislative and management directions required to protect endangered species when planning and conducting fuel reduction burns and fire breaks.

The impact of fire on fauna in Australian ecosystems has been reviewed by Friend and Wayne (2003)[#]. They discuss the effects of frequency, intensity, timing, scale of burning, and effects of drought and other factors, on environmental outcomes. However, it seems that the information presented there has been ignored by operational sections of DSE/PV when drawing up fire plans. In particular, the plans for the Grampians NP take no account of the need for vertebrate fauna to re-stock from adjacent unburned refuges, or the danger of eliminating species by burning those refuges.

Whilst there is a dearth of long-term data on the effects of fire on the biological diversity of flora and fauna in the Grampians, some facts are well known:

- **The Long-nosed Potoroo (*Potorous tridactylus*) and Southern Brown Bandicoot (*Isodon obesulus*)** are absolutely dependent upon areas of dense cover in the range of 5-10 ha. The Southern Brown Bandicoot is known

to occur in the Serra Range targeted to be burned; records of the Museum of Victoria and other observations confirm that this is also a refuge and re-stocking site for the Long-nosed Potoroo, endangered in Victoria.

- Species such as the **Heath Mouse** (*Pseudomys shortridgei*) that is present in the Grampians cannot survive (find food or shelter) in heathland burned less than 5-6 years ago, **and they prefer areas unburned from 10-25 years.**
- Studies in the Red-Tailed Black Cockatoo habitat west of the Grampians has shown that it takes at **least 10 years following fire before Brown Stringybark trees produce a seed crop.** Gang Gang Cockatoos and in general the woodland bird communities of the Grampians rely heavily on the eucalypt seed or blossom to survive and **would be threatened by burning areas that had escaped being burned in the last 10 years.**
- There are many and varied requirements of vegetation for growth and survival, and **the effects of drought and past fire increase recovery times.** Caution is required when applying prescribed burning to large areas in the Grampians **already severely drought stressed, particularly on the drier western slopes.**
- Wildlife authorities recognise that habitat adjacent to burned areas should **not be deliberately lit within 5-10 years of the fire in the adjacent block** – fauna are unable to survive when that advice is ignored.

We accept the principle that fire is necessary to retain and promote species diversity in our natural ecosystems, and that burning for fire control to protect private property can also accomplish some environmental objectives.

However, we are mindful that DSE/PV is conducting ever larger burn areas, some exceeding 2,000 ha, in order to accomplish the fire-control burn targets for each year. That approach is what is planned for the Grampians area. The problem is that the outcome is never certain and the entire area could (and often does) burn. If autumn burns were lit in the early evening then cooler and more patchy burns might be accomplished, but that would presumably require extra funding. Another problem is that even when a patchy burn results, the same environmental vegetation classes (e.g. Stringybark patches) often burn each time the unit is fired while others (e.g. areas of rocks, swamps,) are left unburned.

Whilst DSE, in correspondence dated 10 Dec. 2007, offered to meet with HFNC later this year in the Grampians, we feel that would achieve little because DSE/PV are not prepared to accept that their plans are ill-conceived with respect to adverse impacts on Park values and outcomes for endangered fauna.

Appendix:

The Hamilton Field Naturalists Club (HFNC) is urging that the 09.G17 (Griffin's Track) planned burn is rescheduled by at least 5 to 10 years and its size reduced.

HFNC is opposed to this **Zone 3** fuel reduction burn for the following reasons:

- No case has been provided as to why it is necessary to burn this area at this time, given that large adjacent areas have been severely burned recently. **The proposed fuel reduction burn takes no account of issues of biological diversity (especially of fauna) in the southeast extremity of the Grampians National Park.** The area south of Griffin's Track is part of a narrow peninsular of Crown Land and is not part of a larger block. The Mount Lubra wildfire in 2006 has left this area as an unburned "Island" and refuge for endangered fauna species.
- Areas adjacent to those burned within the past 3 years by hot, destructive fires (Mt Lubra wildfire and Wannon fuel-reduction burn) are serving as a refuge for vulnerable/endangered species. The 09.G17 burn will effectively reduce the remaining refuge-habitat available for remnant populations of Long-nosed Potoroo and Southern Brown Bandicoot, and is **likely to lead to the extinction of these species within the Grampians Bio-region.**
- The area planned for burning is within the driest aspect along the western slope of the Serra Range ridge-line and **is already under significant stresses due to the prolonged drought.** The recovery of the vegetation, and thus the restoration of habitat will be much slower and needs to be considered in management decisions.
- The 09.G17 fire would burn a huge percent (30-40%) of the remaining unburned bushland, i.e. more than 50% of the peninsula will be burned if this planned burn takes place. **This is unacceptable and amounts to vandalism of the National Park, a place that is supposed to support and protect fauna and flora and environmental values.**
- This area contains a restricted Ecological Vegetation Class (EVC), Valley Grassy Forest, 90% of which has been burned by the Mt Lubra wildfire and subsequent controlled burns. Burning the remaining remnant will almost eliminate this EVC from the Grampians.
- Because of the 2006 wildfire and recent hot fuel reduction burns from Serra Range east to Wannon River in 2005 & 2007, it is very misleading to regard the area planned to be burned as a small percentage of the Grampians as a whole and therefore of little consequence.

Reference - Gordon Friend and Adrian Wayne (2003) Relationships between mammals and fire in south-west Western Australian ecosystems: what we know and what we need to know. pp. 363-379 in "Fire in Ecosystems of South-west Western Australia" (ed. Ian Abbott and Neil Burrows; Backhuys Publishers, Leiden, The Netherlands).

With kind regards
Hamilton Field Naturalists Club

Reto Zollinger
President