

**Submission to
The Council of Australian Governments
Inquiry on Bushfire Mitigation and Management
From
The Forest Owners Conference**

The Green Triangle Forest Owners Conference

The Green Triangle Region is Australia's largest plantation growing region in terms of both area and economic output. It encompasses the area bounded by Portland and Hamilton in South West Victoria and Naracoorte and Robe in South East South Australia. Since the first plantations were established in the late 1800's nearly 300,000 hectares of softwood and hardwood plantations have been established in the Region. These plantations now support significant processing and export industries in the area.



The Forest Owners Conference (FOC) is an industry group currently made up of 12 plantation growers and fire fighting agencies in the Green Triangle Region. The group commenced following the Caroline Fires in October 1979 it meets biannually to discuss fire issues and has developed well-coordinated fire prevention protocol and wildfire response procedures. FOC members manage the majority of the Region's 300,000 hectares of plantation land and form an integral part of the community fire suppression forces.

The Forest Owners Conference Charter is:

- To reinforce and encourage effective cooperation and mutual support between forest owners from both sides of the South Australian / Victorian Border, in relation to fire issues.
- To provide a forum where operational fire issues can be discussed and where appropriate agree on a standardised approach.
- To promote well coordinated fire prevention protocol and wildfire response procedures between forest owners.
- To comply with and promote FOC plantation design guidelines
- To support aerial detection and suppression arrangements for the Green Triangle Region.

Forest Owners Conference Submission to the Inquiry

FOC Members have extensive experience and can speak with authority on the management of fire in the rural environment. There are a number of principle tenants with which the FOC would like to preface their submission to this inquiry:

1. Fire is a natural part of the Australian environment and will always be a factor in the management of rural land. The severity of the annual fire season will vary from year to year, depending on the rainfall deficit, fuel loads and weather conditions. The key is to take measures to avoid the loss of life and to reduce the potential of major impact on property, community and the environment.
2. All land managers (including Government Agencies) have a duty of care to protect the environment, neighbours and the community from unreasonable levels of fire risk.
3. Bushfire management needs a holistic approach. It requires the integration of strategic prevention measures, including property design to facilitate fire control, hazard reduction and management of ignition potentials. The level of preparedness must escalate according to increased fire risk and these prevention measures must be supported by a rapid and effective suppression capability.

Rather than try to encompass the whole bushfire scenario, FOC will generally comment on the issues of fire management that impact to the greatest extent on the plantation forest industry and areas where FOC see that its experience may assist the deliberations of the Inquiry.

Risk factors contributing to bushfires

It is a known fact that the majority of fires that have resulted in significant plantation losses have started outside of plantation land and the 2002/03 losses are no exception. We are thus acutely aware of the impact that neighbouring landowners can have on plantation assets and wish to see consistent fire protection policies across all classes of land holdings.

The potential for escapes from neighbouring land into plantations is a cause for concern for the forest owners. This is especially an issue on the cusp of the fire season when many farmers are cleaning up around their properties. A recent fire in the Dartmoor area highlighted this. The farmer was legally allowed to burn-off as CFA fire season restrictions have yet to be introduced. However the fire escaped and had the potential to threaten a plantation. In Gippsland in September 2003 a fire escaped from a private burn and destroyed 190 hectares of plantation. Fire services need to ensure that the provisions in the legislation and permit systems adequately control private burns. Publicity campaigns are required to highlight this issue and perhaps a greater willingness of the Fire Services to pursue prosecutions will reinforce the obligation to conduct burns in a safe and responsible manner.

In this Region there are three different periods for fire season restrictions, which leads to confusion amongst the public. The Country Fire Service has already introduced restrictions in South Australia. In Victoria the Country Fire Authority are planning to introduce restrictions on the 22nd December 2003 whilst the Department of Sustainability and Environment will introduce restrictions (which affects private property within 1.5 km of protected public land) on the 8th December 2003. Consistency in the introduction of restrictions would reduce confusion.

R1 Fire Services review their legislation and burn permit system to ensure adequate controls are placed on all burns to prevent escapes to neighbouring properties.

R2 Fire Services, especially in State Border Areas, should aim to standardise the conditions for fire season declaration and burning permits.

Bushfire Mitigation Strategies

Coordinated Fire Prevention

Coordinated fire prevention strategy development ensures a consistent approach between all landowners and managers with clear responsibilities for prevention and suppression and accountability for outcomes. Risk management is most effective when a single entity is responsible for prevention, pre-suppression planning and suppression.

All land managers have responsibility to ensure appropriate planning and management of their estate will result in effective and rapid fire suppression. This may involve the provision of appropriate access tracks, firebreaks and water supplies and as well the management of fuel and ignition potential on their property.

We commend to you the approaches that FOC has taken in establishing property design guidelines (see appendix – FOC Plantation Design Guidelines) and the development of ignition management protocols. These protocols seek to minimise the risk of ignition by regulating machinery exhaust temperatures, specification of minimum fire equipment / resources for all equipment working in plantations, and the implementation of work bans and restriction on public access when local risk factors are high. We believe that similar guidelines and protocols should be adopted by all industries working in fire prone areas.

In Victoria, the CFA have progressed towards developing good design guidelines for plantations but the forest industry has protested at the release of these on their own. Forest Owners believe that this may create a perception in the community that plantations are inherently more dangerous during fires. These guidelines should only be released when coupled with guidelines for other industries such as cropping and grazing to ensure a consistent approach to fire prevention in rural areas.

R3 Rural industries and communities be encouraged to develop policies and protocols to minimise fire risk through good property design, fuel management and minimisation of ignition risks.

R4 That planning guidelines, such as the Victorian CFA *Fire Prevention Design Guidelines for Plantations* be released in a package that contains similar guidelines for other rural industries such as cropping and grazing.

Planning and Building Codes

We are aware of a number of cases where Local Government has allowed inappropriate development such as residential subdivisions, next to or within existing plantations and forests, without adequate consideration of the fire risk. It is important that a consistent approach is taken and that existing rights of neighbours such as plantation companies are considered prior to granting development approvals. Plantation companies should not be expected to create larger fire breaks just because someone has built a house too close to the plantation.

Australians who choose to live in the rural environment and on the rural urban fringe need to take responsibility for their actions and take additional measures to protect their property. Again these include good property design, effective management of fuels and ignition sources on their properties, some on-site fire suppression capability and may even mean paying higher insurance premiums for higher risk.

There is a certain level of ignorance in the community of the risks and responsibilities of living in a fire prone environment. Governments – Federal, State and Local– and the insurance and real estate industries have a role in educating the community of these risks and responsibilities.

R5 Ensure consistent approaches to planning for fire prevention and protection and that existing rights of neighbours are considered in planning development applications.

R6 Federal, State and local Government, along with the insurance and real estate industries fund a communications program highlighting the risks and responsibilities of living in a fire prone environment.

Response Arrangements and Resource Deployment

Large intense wild fires are capable of overwhelming even the best-equipped fire fighting force. The key to minimising the impact on the community is good prevention works, good planning, early detection and rapid suppression. The first attack force must be highly mobile and have sufficient resources to be effective.

The fire suppression response capability should be matched with the risk. Real time monitoring of the fire risk should occur and the suppression resources deployed accordingly. Contracts for special resources, such as fire fighting aircraft should be flexible enough to allow scaling up and down of resources according to risk.

FOC are active in the development of strategies and practices to maximise the fire response in the Green Triangle Region. Collectively FOC members contribute over 60 fire tankers and 260 personnel to the regional fire response resources. We have regular meetings to review and coordinate the

deployment of these resources, including a morning FOO phone¹ discussion whenever the forecast Forest Fire Danger Index exceeds Very High - 24.

FOC members fund fire look-out towers, aerial reconnaissance and fire bombing services. This has ensured rapid detection and response to fires in the Green Triangle Region. The principle tenant of FOC is mutual support. When a fire is reported, FOC members automatically dispatch resources, regardless of the tenure of the land. Likewise when one forest owner has resources committed, the other forest owners step up their resources to ensure adequate regional coverage.

FOC commends to the inquiry, the Southern Border Fire Co-ordination Association's (SBFCA) *Guidelines for co-operation between Victorian and South Australian Organisations on Fire Suppression in the Southern Border Area* (attached in the appendix.) FOC members have been instrumental in the development of these guidelines, which have evolved to meet the needs of firefighting in the Border zone and have been well tested in the coordination and cooperation between fire agencies in the Green Triangle Region.

These arrangements are tested each year in a pre-season fire training and response exercise Operation Borderhop. The format and the location of the exercise vary each year with the aim to develop close working relationships between all organisations and to test communication and organisational systems. In 2003 Borderhop tested the development of an Incident Control Centre through a simulated cross-border fire. Over 40 people were involved, including personnel from Country Fire Authority (Vic), Country Fire Service (SA), Department of Sustainability & Environment (Vic), ForestrySA, Auspine, Yates and Hancock Victorian Plantations.

R7 Fire Services develop real time monitoring of fire risk and deploy resources accordingly.

R8 SBFCA Guidelines for co-operation be used as a model for developing better cross-border relationships between fire fighting organisations.

Impacts of Bushfires on the Environment, Human Life, Property and the Economy

The loss of greater than 11,000 hectares of plantation in the ACT and a further 2,500 hectares in Victoria has a significant impact on the plantation owners, wood production industries and local communities. There are short term effects resulting from the significant shift in resource base with the need to salvage any timber before it deteriorates. This rescheduling of harvest invariably means that wood processing mills are forced to take a sub-optimal log mix, which may cause an immediate economic impact and, in the longer term, may result in the loss of industries that provide significant local employment.

To put the loss into some perspective, the loss of 20,000 hectares of plantation in the Green Triangle Region in the Ash Wednesday fires in 1983 still has a significant effect on the local community today. It has been estimated that the current loss in volume is ~ 500,000 m³/annum, the equivalent of an additional major sawmill in the area, employing up to 500 people directly and supporting 1500 to 2000 people locally.

The plantation industry has long lag times between planting the crop and return on investment and plantation owners therefore take any threats to their crop very seriously. The community and fire services need to recognise that the burning of plantation forests may have a significant impact on the economy and long term employment.

FOC was disappointed that virtually no mention was made of the plantation losses in Victoria in CFA media releases that listed the assets lost in the fires. We were told by the CFA that such losses were not news worthy enough.

R9 Fire and emergency services recognise that timber plantations are significant economic and community assets.

¹ The FOO phone is an anachronism but effective method of communication, a fixed line telephone that permanently connects the major plantation growers and fire services.

Adequacy of Infrastructure and Human Resources for Fire Mitigation

Fire Research

Fire is an Australian community problem. We cannot afford to become complacent and must continually search for knowledge and innovations, which may assist in reducing the impact of fires. To this end, it is important that Federal and State Governments continue to provide adequate funding for research and development. Topics that require continued research include:

- Fire climate and weather.
- Real time monitoring of fire danger risk
- Rapid / early detection of fires – remote sensing
- Wildfire behaviour and development
- Fire management techniques
 - Effective work practices and machinery design to prevent ignition
 - Fuel reduction burning and fuel modification
 - Effective suppression strategies
 - Back burning as a control strategy
 - Effective control lines
 - Safe fire lighting techniques
 - Fire frequency
 - Ecological impacts of wildfires and fuel reduction burning
 - Ability to modify fuel loads and consequently reduce fire severity
 - Smoke management modeling
- Firefighter health and safety
- Development of fire fighting equipment
- Development of effective fire ground communication and information systems
- Ecological burning strategies
- Effective property design
- Community risk management and people protection
- Development of appropriate codes for building design.
- Community education programs

[R10 Federal and State Governments ensure adequate funding for fire research, including research in wildfire behaviour, impact and risk management in plantations and provide forums for the plantation industry to provide advice on research priorities.](#)

Aerial Attack

There has been a tendency in recent years for the Government to support large major contracts for equipment such as the Erikson Skycranes. Whilst these are effective fire suppression equipment, under certain circumstances (especially around the urban fringe), the support of these should not be at the expense of smaller more flexible aircraft. The FOC is strongly of the opinion that fixed wing fire bombers and medium sized helicopters are vital pieces of fire fighting equipment. We can cite numerous cases where the rapid deployment of fire bombers in conjunction with ground forces, in first attack, has resulted in the effective suppression of the fire before it has a chance to develop into a major conflagration.

In recent months the Victorian Government has indicated that an additional fixed wing fire bomber will be relocated to South West Victoria (based at Hamilton, in addition to the existing contract bomber at Portland) to provide additional aerial attack capacity. Last season the South Australian Country Fire Service, in partnership with Forest Owners Conference members increased its support from one to two fixed wing bombers at Mount Gambier, on high risk days. FOC welcomes these moves.

It is not uncommon to have severe fire weather across significant geographical areas. Coupled with lightning storms, this often results in numerous fire starts, which presents a challenge to all fire services. With numerous trained and competent local aerial agricultural aircraft on standby for fire bombing there is a high probability of rapid and successful first attack.

During the 2003 fires in Victoria, the majority of the fire bombing resources were deployed to the fires in the east of the State. Whilst we don't dispute that you deal with the going fires as a priority, we felt that the west of the State was left vulnerable on a number of high fire danger days. Inquiries to local agricultural aircraft contractors revealed that there were suitable planes and pilots available for standby that had not been contracted by the fire authorities. The pre-season planning needs to include provisions for the short term contracting of this equipment and ensuring that the equipment and skills of the operators are to specification.

The FOC believes that aircraft contracted to state agencies, located in border areas need to be freely available to respond over state borders, so that the closest appropriate and available resources are responded, regardless of jurisdiction. The FOC encourages as part of the National Aerial Firefighting Strategy, the development of integrated mutual support arrangements for aircraft across state boundaries to allow for the seamless response of aircraft to fires, in accordance with established risk based resource allocation and standards of cover principles.

[R11 Fire Services explore flexible contract arrangements to ensure adequate fire bombing coverage across all regions with high fire danger.](#)

[R12 As part of the National Aerial Firefighting Strategy, Fire Services continue to develop integrated mutual support arrangements for aircraft across state boundaries that allow for the seamless response of aircraft to fires, in accordance with established risk based resource allocation and standards of cover principles.](#)

Communications

Radio communications is still a significant issue in fire fighting, especially in the State Border areas. Most fire and emergency services have changed frequencies and systems in recent years. Unfortunately the States have also developed systems that are incompatible with each other. In this area, Victoria and South Australia both have Government Radio Network trunk systems, which do not communicate with each other. Both systems also have a conventional system for fire suppression radio traffic but one is VHF and the other UHF! This means that fire control vehicles need to carry and monitor at least two, more often three and sometimes up to five radios! The UHF frequencies also have very limited range in forested and hilly environments and may result in poor fire ground communications.

Mobile phones are an increasingly useful resource in fire communications but there are a number of holes in the coverage in the SA / Victoria Border Region. Providers of communication systems place towers to give good coverage over main roads but frequently forested areas have poor coverage. This can lead to poor fireground communications and may result in larger areas being burnt and a higher risk to fire fighters

[R13 Fire Services develop seamless communication systems to allow fully integrated fire fighting efforts, regardless of State Borders.](#)

Liability and Insurance

The issue of fire fighter liability is perhaps the greatest threat to good incident control decision making and is a major disincentive for community members to participate in fire suppression activities. The liability issue is further clouded with increasing reliance on contract fire fighting resources and corporate volunteers. The Victorian Government legislation requiring industries to form fire brigades is discriminatory; to date, it has only been applied to one industry, the forest industry. Legally there are many areas of this legislation that are open to interpretation and the companies are concerned that companies and company directors may be liable for incidents involving their fire crews even when working under the control of the Country Fire Authority.

The Victorian Government and CFA have proposed to review the Country Fire Authority Act 1958. Within this review, it is important that anomalies relating to the powers and rights of Forest Industry Brigades are addressed. Changes are required to ensure that powers and liability protection arrangements are consistent between Forest Industry Brigades and other CFA Brigades, regardless of the whether Forest Industry Brigade members are firefighting in Victoria or interstate, on freehold or crown land. FOC members are concerned about the time it has taken from when issues were identified (2002) to when they are likely to be rectified with a change in the Act and Regulations – proposed for 2005! The companies may be legally exposed throughout this time.

FOC members were actively involved in the Victorian Bogong complex fires. They had some experiences where they deemed there was a lack of aggression in the fire fighting strategy and a delay in authorising appropriate back burning operations. We believe that the Linton Coroner's Investigation has developed a culture where fire fighting officers have a great fear of making mistakes.

FOC is concerned about the potential for incidents at fires to lead to massive rises in workers compensation premiums (or the inability to self-insure as allowed in South Australia) and the potential for industrial manslaughter charges to be brought against company directors. We believe that fire fighters and their employers should be covered by a common insurance policy regardless of whether that person is a volunteer or employed by a fire service or company brigade.

[R14 The Federal and State Governments restrict fire fighter and Company liability to ensure that fire fighters are empowered to make decisions based on good local knowledge and experience rather than fear of liability.](#)

[R15 The Federal and State Governments ensure adequate insurance and compensation for all fire fighters and their employers regardless of employment or volunteer status.](#)

Fire Fighting Training and Experience

It was our observation while at the Bogong complex fires that there were few fire fighters with extensive experience. Frequently the most experienced were located in the Incident Management Teams rather than in the field. This resulted in lower achievement rates on the fireline and lost opportunities. Fire Services need to make a concerted effort to develop the skills of their fire fighters through extensive training, participation in prescribed burning programs and active roles in wildfire suppression and streamline the bureaucracy to ensure a better balance between field and the office.

Training and competency assessment of all fire fighters is essential. Unfortunately again, States and even fire fighting agencies within States have different expectations for training and assessment. State services tend to have very parochial attitudes to training which leads to frustration when plantation companies have fire fighting responsibilities on two sides of the State Border. The Australasian Fire Authorities Council has developed some National competency training modules but there are differing standards in their implementation. Bush fire training needs to be reviewed and national standards implemented across all fire services.

All fire fighters, including volunteers, must be trained and skilled appropriate to the types of risks they are likely to face. With the changing rural landscape – an increase in cropping, intensive agriculture, timber crops, hobby farms and industrial development around rural cities – the focus of the training needs to reflect the local conditions.

Dealing with multiple bureaucracies is a feature of life in the State Border zone. We have the situation in the Green Triangle Region, where the South Australian Country Fire Service and the Victorian Country Fire Authority insist on different minimum levels of accreditation in authorising fire fighters to attend fires. Fire fighters qualified in Victoria are not recognised in South Australia. Plantation companies also get very frustrated when fire services insist that their fire fighters need to be trained in modules (eg Structural Fires) which have no relevance to the fires that these people attend.

Some fire services such as the Department of Sustainability and Environment (Victoria) have well developed training and assessment systems which follow a logical hierarchy (Operations Fire Fighter Basic, Level 1, Level 2 and Level 3) but not necessarily aligned with the AFAC modules. The CFA (Vic) has commenced the development of Operational Leadership Roles for Wildfire training system but has yet to develop all the training and assessment units within the system. National training packages need to be developed to ensure that there is a logical progression in training and qualifications from crew level through to Sector Commander, Divisional Commander and Incident Control for bushfires.

[R16 Fire Services need to actively develop their fire fighting skill base through good training and participation in prescribed burning programs and wildfire suppression.](#)

[R17 Whilst acknowledging the need for experienced people in the Incident Management Teams, Fire Services need to streamline the bureaucracy to ensure a better balance of experience between the field and the office.](#)

[R18 National bushfire training and competency standards be reviewed and standardised across all fire fighting services.](#)

R19 Standardised National qualifications be developed to recognise the logical progression of skill development from crew through to Incident Control for bushfires.

Acknowledgment

The Forest Owners Conference would like to thank Council of Australian Government for the opportunity to comment on bushfire management in Australia and would be very pleased to make a verbal submission to the Inquiry Committee if invited to do so.

Yours faithfully,

Ruth Ryan
Chairperson
Forest Owners Conference

Appendices:

FOC Plantation Design Guidelines
SBFCA Guidelines for Co-operation between Victorian and South Australian Organisations
on Fire Suppression in the Southern Border Area