

Hon Dr Denis Napthine
Premier of Victoria
1 Treasury Place
MELBOURNE VIC 3002

30 July 2013

Dear Premier

Re: Royal Commission Recommendation 57

We note that the "Victorian Coalition Government is committed to fulfilling its 2010 election promise to implement all 67 recommendations of the 2009 Victorian Bushfires Royal Commission (VBRC)."

Recommendation 57 states "The Department of Sustainability and Environment report annually on prescribed burning outcomes in a manner that meets public accountability objectives, including publishing details of targets, area burnt, funds expended on the program, and impacts on biodiversity."

We would be pleased to know when your government will report on the impacts on biodiversity of the prescribed burning program. We note that this is already overdue. Could you please inform us regarding whether funding has been allocated for the implementation of this recommendation and whether scientists have been engaged to produce the report?

We are aware of the Hawkeye program, however this is a separate monitoring program and is not developed to annually report on the impacts on biodiversity of the burning targets.

It is critically important that in this rush to be seen to be protecting life and property that we do not significantly change the landscape and endanger species and ecosystems.

The argument that fire is natural in our environment does not take into account that we are intervening at such a large scale and with such frequency. Nor does it recognise that many targeted remnants have greater significance as they now represent a much smaller fraction of the landscape and are the final bastions supporting the preservation of the remaining biodiversity.

Pointing to indigenous fire regimes as an argument for large scale planned burning is also not scientifically established and it is highly unlikely that the indigenous population burnt over 300,000 hectares of Victoria every year. It is likely that indigenous burning in Victoria was mainly undertaken in areas such as grasslands and grassy woodlands, not our forests and other areas such as the Mallee and Wimmera.

In July 2012, the independent report from the Bushfires Royal Commission Implementation Monitor, Neil Comrie outlined the Coalition Government's progress in implementing the recommendations of the VBRC.

"The BRCIM questions the rolling target as the most effective way to increase the level of planned burning across the State as working towards a pre-determined target may diminish the State's ability to focus on risk reduction in high risk areas.

The BRCIM advocates that the State reconsider the planned burning rolling target of five per cent as the primary outcome as part of the planned burning reform program. It is considered that the most important objective of the planned burning program must be to address public safety risks in line with the VBRC's intentions."

Our groups also question the advisability of a rolling target of planned burning. Large tracts of Victoria's public land are being subject to planned burning without proper monitoring of the effects of these burns on biodiversity, or the effectiveness in relation to public safety.

While these targets are being sought, large areas of public land close to and abutting rural dwellings, frequently infested with inflammable weeds are being ignored. These areas represent a very high danger to life and property but require more effort than large burns away from towns. This shows that targets based on area rather than on protective outcomes is flawed.

Research by the Australian National University into the Black Saturday fires "found that modifying fuel closer to houses was a more effective way to reduce house loss than modifying fuel distant from houses."

Our groups consider that the effectiveness and impacts of the planned burning program should be regularly assessed and request that your government implement Recommendation 57.

We wish to request a meeting to further discuss the issues raised in this letter.

Your attention to this matter would be greatly appreciated.

Yours faithfully,

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On behalf of

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