Submission to ACT Government: Draft Regional Fire Management Plan 2019-2028

May 2021

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

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Introduction

The Conservation Council welcomes the opportunity to comment on the Draft Regional Fire Management Plan (RFMP), which outlines how bushfire fuel management will be conducted on ACT Government-managed land across the Territory from 2019 to 2028.

The development and implementation of strategic management plans will help to prepare for and reduce the risks associated with fire, however it is important to acknowledge that protection against bushfire in the ACT is integrally linked to the management of non-urban areas including parks and reserves, and the protection of ecological values.

Residual Risk

The Conservation Council supports the adoption of the residual risk model in the RFMP. As noted in the plan, this model is already effectively utilised in other jurisdictions and will assist to deliver strategic bushfire management, reducing fuel loads in locations where it will have the most effective impact, while ensuring that ecological outcomes are able to be considered. A residual risk model importantly acknowledges that fire risks can be reduced using fuel management techniques, but not entirely eliminated.

Inclusion of Aboriginal Fire Management Zone

The inclusion of an Aboriginal Fire Management Zone in the RFMP is strongly supported. Indigenous burning practices and land management techniques continue to play an important role in enhancing the resilience of ecological communities and subsequently support long-term conservation outcomes. The Conservation Council encourages further collaboration between ACT fire managers and Indigenous communities to expand the use of indigenous fire management practices in the ACT and progressively extend Aboriginal Fire Management Zones throughout the ACT and broader region.

Recommendations

1. Consider further development and implementation of Indigenous fire management practices throughout the ACT and region, and facilitate collaboration between Indigenous communities, fire academics and ACT fire managers to support this.

Planning in a changing climate

The Conservation Council understands that this RFMP has been developed after the significant Orroral Valley Fire in 2019/2020 which impacted 80% of Namadgi National Park and 22% of Tidbinbilla Nature Reserve. In the face of a changing climate, increases in the unpredictability of wildfires and the associated risks are to be expected, and regional fire management plans need to reflect this. Fire management plans need to have the flexibility to adapt when unprecedented events such as the Orroral Valley fire occur, and as such, while we support a review in 5 years, should there be a significant change in the fire context in the ACT, an earlier review may be warranted.

Recommendations

2. Ensure flexibility is built into the review mechanism of the Regional Fire Management Plan.

Prescribed burning and protection of unburnt areas

The Conservation Council supports prescribed burning where it is conducted in accordance with best-practice and guided by scientific and Indigenous knowledge. It is important that all prescribed burning in the ACT and region accounts for and mitigates risks to threatened species and ecological communities, fire-sensitive communities and recovery thresholds, waterways and water catchment areas and high quality ecosystems in the landscape.

The Conservation Council strongly supports the removal of the Orroral Valley fire footprint from the RFMP and fire management zones until at least 2024. This will provide fire-affected ecosystems and species with time to recover. However, it is likely that this timeframe will need to be extended. The severity and intensity of the Orroral fire has had significant impacts on biodiversity and ecological communities, including reducing viable threatened species habitat, damaging and degrading a large portion of the Alpine bog community, and significantly increasing the threat of native species predation.[1] As such, the ACT Government should consider excluding the Orroral fire footprint from prescribed burning for the entire length of the plan (until 2028) and only consider prescribed burns after 2023 if it will support the ecological values of the area and deliver direct benefit to fire managers".

A recent study by Phil Zylstra illustrates that open forests that have been burnt, such as those that expand across the Brindabellas and into our national park and reserves, retain a high flammability rate until approximately 28 years post fire.[2] Given that some of these areas were burnt in 2003, and then again in 2020, it has become important to protect remnant forest that was minimally or not affected by the 2020 or 2003 fires, both from wildlife and prescribed burning. These remnants will soon have re-developed a canopy structure that supports self-thinning of the forest's underlayer and retention of soil moisture on the ground floor - both important considerations when considering fire risk. This will become an advantage for fire managers when future fires occur in this landscape.

Recommendations

3. Consider excluding the Orroral fire footprint from fire management zones and practices for the entire length of the plan (until 2028) before considering further management.
4. Prioritisation of the protection of unburnt forests across the ACT that survived the 2003 and 2020 fires, including from prescribed burning and where possible, wildfire attack.

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[1] ACT/NSW Rapid Risk Assessment Team (2020) *Orroral Valley Fire Rapid Risk Assessment - Namadgi National Park*. Unpublished report. Environment Planning and Sustainable Development Directorate. ACT Government, Canberra.
[2] Zylstra, P.J (2018). *Flammability Dynamics in the Australian Alps,* Austral Ecology: a journal of ecology in the Southern Hemisphere, 43 (5), p.583.

Other fuel management strategies

The RFMP recognises that in addition to prescribed burns, other fuel management strategies including grazing and mowing will be utilised. The Conservation Council recognises that both mowing and grazing can deliver ecological and risk-reduction benefits when guided by best-practice and delivered in a manner that supports and/or enhances the ecological values in the landscape. As such, these practices are supported where this can be demonstrated. However on a whole-of-landscape basis, other management techniques should be prioritised before grazing, mowing and slashing.

Mowing is widely utilised across the ACT to manage greenspaces including verges and parks within the urban footprint. However, mowing is both an expense to Government and can contribute to the spread of invasive plant species. Some invasive plants such as African Lovegrass (ALG) actually benefit from mowing regimes through the distribution of seed heads across the landscape. ALG poses a significant ecological threat to ecosystems in the ACT, both for its widespread distribution in natural ecosystems and high flammability risk. Whilst minimising mowing and slashing practices will not eliminate these risks, it will reduce the likelihood of further spread.

Similarly, inappropriate grazing regimes using livestock or other introduced species can reduce native biomass important for soil health, encourage the introduction and spread of invasive plant species and erode the soil causing loss of moisture. The impacts of grazing on natural environments is detrimental and as such grazing should not be used as a management tool in locations where it hasn't previously occurred.

Recommendations

5. Minimise mowing and grazing fire management practices to ensure they are only practiced where necessary, or where ecological protection and/or enhancement can be demonstrated.