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Attention: CFS Bushfire Management Planning Unit
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Comments on draft Outback Bushfire Management Area Plan

The Nature Conservation Society of South Australia (NCSSA) welcomes the opportunity to provide comment on the draft Outback Bushfire Management Area Plan (BMAP). As South Australia's primary nature conservation advocacy organisation, NCSSA has an active interest in the protection and conservation of South Australia's natural resources with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities, management of remnant native vegetation and protected areas.

We provide the following feedback on the draft BMAP that we trust will be duly considered and of assistance in finalising the document. We look forward to ongoing involvement with the BMAP planning process and would be available to clarify or discuss any of the points raised in this submission via email to nicki.depreu@ncssa.asn.au or phone (08) 7127 4633.

Yours sincerely,

Nicki de Preu

Nature Conservation Society of South Australia

NCSSA Comments on specific sections of the draft Outback Bushfire Management Area Plan

1 INTRODUCTION

We support the plan's recognition of the role that fire plays in the Region's biodiversity and that fire is a natural element in this environment, however, there are some fire sensitive plant and animal species and ecological communities that are not dependent on fire for their continued existence and can be severely damaged by its impacts. We recommend the plan acknowledge that fire is a threat to some species and ecological communities and the negative impacts that can result from too frequent fire.

1.1 Purpose and Scope

We commend the plan's authors for incorporating a risk assessment of environmental assets in this initial draft and support the application of the methodology developed by the Ecological Technical Reference Group in determining the level of risk to specific assets.

1.2 Objective

We support the listed objectives for the plan in particular the management of fuels on a landscape scale to mitigate the adverse effects of major bushfires and the protection of Areas of Cultural Significance under the guidance of Traditional Custodians. We also support the proposal to develop community bushfire protection plans in consultation with local communities in the future.

1.2.1 Constraints, Assumptions and Exclusions

We acknowledge that data/formulas used for the risk assessments in the development of this plan have been based on the best available information at the time of development and may be subject to change over time as more accurate data and information becomes available. We also recognise the challenges involved in assessing fuel loads across the vast extent of the Outback BMA given seasonal variation and unpredictability of rainfall

2 Outback Bushfire Management Area

2.1 Location

We recommend the information relating to Nepabunna Community is amended to recognise that this community is responsible for the management of the Nantawarrina Indigenous Protected Area that covers around 580 km².

2.4 Land Tenure and Use

We acknowledge the diverse range of land tenures and uses across the Outback BMA and the influence these may have on bushfire issues such as chance of ignitions, ability to establish and spread and suppression activities and support the tenure blind approach to bushfire management planning.

We recommend that the information about properties within the BMA that have been converted into private conservation areas is amended to include Kalamurina, Arkaroola and others to reflect more than one organisation's involvement with these properties.

2.5 Topography

We suggest that it would be useful to include a map showing the vegetation communities that occur across the Outback BMA in addition to the description of the topography.

2.5.1 Water Catchments

We recommend this section acknowledge that the Mound Springs associated with the Great Artesian Basin are a critically endangered ecological community under the EPBC Act. We also suggest that this section acknowledge that the internationally important Ramsar wetland of the Coongie Lakes, covering more than 2 million hectares, is the largest Ramsar site in Australia.

2.6 Fire Weather and History

The sentence in the second last paragraph "the biggest threat to the pastoral areas is displaced feral animals looking for feed after wildfire events" needs clarification. It would be useful to provide some examples of the feral animals e.g. camels. Also, grazing by feral animals is just one of many threats to biodiversity in the Outback BMA. Predation by feral cats and foxes are also a significant threat but particularly following bushfires when habitat and food resources are limited.

As a minor editorial note the title of Map 5 needs amending to: Fire History (2018/2019 Fire Season).

2.7 Cultural Fire Management

We strongly support that the recognition of the importance of cultural fire management and concur that on Aboriginal owned land, it is the Traditional Custodians who have final say about the management of their country. In addition to the DEW Burning on Private Land project, we suggest it may be useful to refer to other Witjara Waru Pulka (Fire) Management Strategy as a recent attempt to plan for burning in a way that places the cultural values of the Traditional Custodians, the Lower Southern Arrernte and Wangkangurru people, front and centre for Witjara National Park (noting it is also referred to on page 18).

We suggest the sentence “Most native bushfood plants are sensitive to unplanned fire regimes” requires clarification and could be amended to “Most native bushfood plants are sensitive to large, infrequent fires having adapted to the traditional cultural burning practices of Aboriginal people”, if that is the correct interpretation.

2.8 Climate

2.8.4 Climate Change

We commend the plan’s authors for acknowledging the impacts of climate change on bushfire frequency and intensity and providing links to the BoM and CSIRO websites that provide current information and climate change trends and modelling.

2.9 Buffel grass

We commend the plan’s authors for acknowledging the effects of Buffel grass in relation to increasing fuel loads and impacts on biodiversity. We strongly support the suggestion that the State Bushfire Coordination Committee be encouraged to liaise with its interstate counterparts to push for the relevant interstate agencies to consider changing the status of buffel grass in WA and NT. We also support the monitoring and eradication actions the AW NRM Board have been undertaking at various locations within the MT and Yalata lands and the sharing of knowledge regarding effective control techniques between community groups. We recommend this section also refer to the South Australia Buffel Grass Strategic Plan that identifies priority areas for management of Buffel grass within the Outback BMA and beyond.

2.10 Environment

We suggest that it would be useful to distinguish between threatened plants/animals and ecological communities listed under national (EPBC Act) and state (NPW Act) legislation in this section. The information could be easily be presented as a table within the BMAP and provide greater clarity about the conservation significance of various species/ecological communities. We also suggest that it be explicitly stated that these species and ecological communities are threatened with extinction as a result of a variety of changes in the landscape that have been instigated by humans, including the introduction of pest species.

We strongly support the need for an increased understanding of how plant and animal species, populations and ecological communities respond to fire regimes to determine if preventative treatment actions are required to reduce the risk from bushfire. We recommend the statement that “most species have adapted tolerances to fire regimes” is amended to “many species have adapted....” and further acknowledge that there are many species that are fire sensitive and can be adversely affected as a result of too frequent fires. The statement “In some parts of the landscape, native vegetation has been highly fragmented due to vegetation clearing” requires further clarification. The Outback BMA primarily covers the pastoral areas of South Australia where native vegetation is considered relatively intact so the preceding statement should acknowledge that.

We recommend the plan acknowledge the secondary risks to the environment associated with risk mitigation activities (e.g. the environmental impacts caused by fire retardants on wetlands).

3.4 Other Land Management Agencies & Traditional Custodians

There are more than 5 private nature reserves that fall within the Pastoral area of SA – Bunkers Conservation Reserve, Warraweena, Pinda Spring and Arkaba Conservancy are all former pastoral properties now managed for conservation. This information requires further review and updating.

4 RISK ASSESSMENT

We strongly recommend that this section provide a clearer overview of the three main Bushfire Management Zones that currently apply in South Australia, namely Asset Protection Zones, Buffer Zones and Conservation Zones as per the text on Page 20 of the 2009 Guide 'Managing Native vegetation to reduce the Impact of Bushfire'. This information should be provided at this point in the plan so that the framework for fire planning is made clear from the outset.

We support the list of environmental assets to be assessed for negative impacts from bushfire but recommend that internationally important Ramsar wetlands and wetlands of national significance are added to this list. We also recommend that the asset "Regionally important significant habitat" is further defined to clarify what this includes i.e. does it refer to the Regional Species Conservation Assessments undertaken by Gillam et al. (2009, 2013) for the West and SA Arid Lands (Outback) Regions? We also recommend that old growth vegetation is included on the list of environmental assets to be assessed due to the significant habitat value it provides.

4.2 Risk Assessment Methodology for Environmental Assets

We support the application of the Standard for the identification and risk assessment of South Australian environmental assets from bushfire (SBCC 2017) and acknowledge its consistency with national standards and guidelines for deriving risk ratings for environmental assets. We suggest that it would be useful for future Consequence assessments to factor in where bushfires have impacted specific parts of a species regional population or distribution of the ecological community as this could have long term effects on the conservation of key environmental assets.

5.1 Bushfire Management Area Wide Risk Treatment Strategies

We support the requirement for all landscape risk treatment works to be undertaken with consideration of all environmental and ecological issues and in accordance with required approvals, such as under the *Environment Protection and Biodiversity Conservation Act 1999* and the *Native Vegetation Act 1991*.

5.2 Asset Specific Risk Treatment Strategies

The BMAP addresses Asset Protection Zones and Buffer Zones but fails to address the existence of Conservation Zones as part of the Risk Treatment Strategies Suite. We recommend that this section of the plan is amended to acknowledge and incorporate Conservation Zones as a component of the overall suite of Risk Treatment Strategies.

Land and Property Management Actions:

We recommend that this section of the plan is amended to include a description of Conservation Zones and how they interact with the Asset Protection Zones and Buffer Zones identified in the plan. Given the size of some of the landholdings in the BMA and proposal to undertake landscape risk treatments we consider it important to acknowledge Conservation Zones in the planning framework.

5.3.5 Prescribed Burning

Further clarification is required in this section regarding the application and use of prescribed burning in Buffer Zones and Conservation Zones. We recommend that this section acknowledge the requirement for identification of clear objectives for all prescribed burns and pre- and post-burn surveys to be conducted to evaluate the burn outcomes.

We strongly recommend that the BMAP acknowledge the impact of prescribed burning on biodiversity and environmental assets and the challenges involved in trying to achieve effective fuel hazard reduction and maintaining conservation values. There have been a considerable number of research investigations, both in South Australia and interstate that demonstrates inappropriate fire regimes (achieved through either too frequent bushfires or prescribed burning programs) can result in a decline in biodiversity values (Gill *et al.* 1999; Pastro *et al.* 2011).

We recommend that this section acknowledge the need for application of and further development of Ecological Fire Management Guidelines to guide land managers on fire regimes that are appropriate for the management of biodiversity conservation values for vegetation communities that occur in the BMA.

6 MONITORING, REVIEWING AND REPORTING

6.2 Review

We support the requirement for a formal review of the BMAP at least once every four years from the approval date of the original plan as stipulated in the *FES Act 2005*. We also support the requirement for all actions and amendments to be reported at least annually to the SBCC however, recommend that this information be made publicly available through the CFS website.

References

- Biosecurity SA (2012) South Australia Buffel Grass Strategic Plan: A plan to reduce the weed threat of buffel grass in South Australia. Government of South Australia.
- Gill, A.M, Woinarski, J.C.Z. & York, A. (1999) Australia's Biodiversity – Responses to Fire Plants, Birds and Invertebrates. Biodiversity Technical Paper, No. 1. Environment Australia. Biodiversity Convention and Strategy Section, Department of the Environment and Heritage, Canberra ACT.
- Gillam, S. & Urban, R. (2009) Regional Species Conservation Assessment Project, Phase 1 Report: Regional Species Status Assessments, West Region. Department for Environment and Heritage, South Australia.
- Gillam, S. & Urban, R. (2013) Regional Species Conservation Assessment Project, Phase 1 Report: Regional Species Status Assessments, Outback Region. Department of Environment, Water and Natural Resources, South Australia.
- Pastro, L. A., Dickman, C. R. & Letnic, M. (2011) Burning for biodiversity or burning biodiversity? Prescribed burn vs. wildfire impacts on plants, lizards, and mammals. *Ecological Applications*, 21(8), pp. 3238–3253.