

Inquiry into Ecosystems decline in Victoria, public hearing by Zoom 26 August 2021

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Victoria's 'Safer Together' policy and the 'Forestry Plan' represent two of the greatest risks to Ecologically Sustainable Development in Victoria².

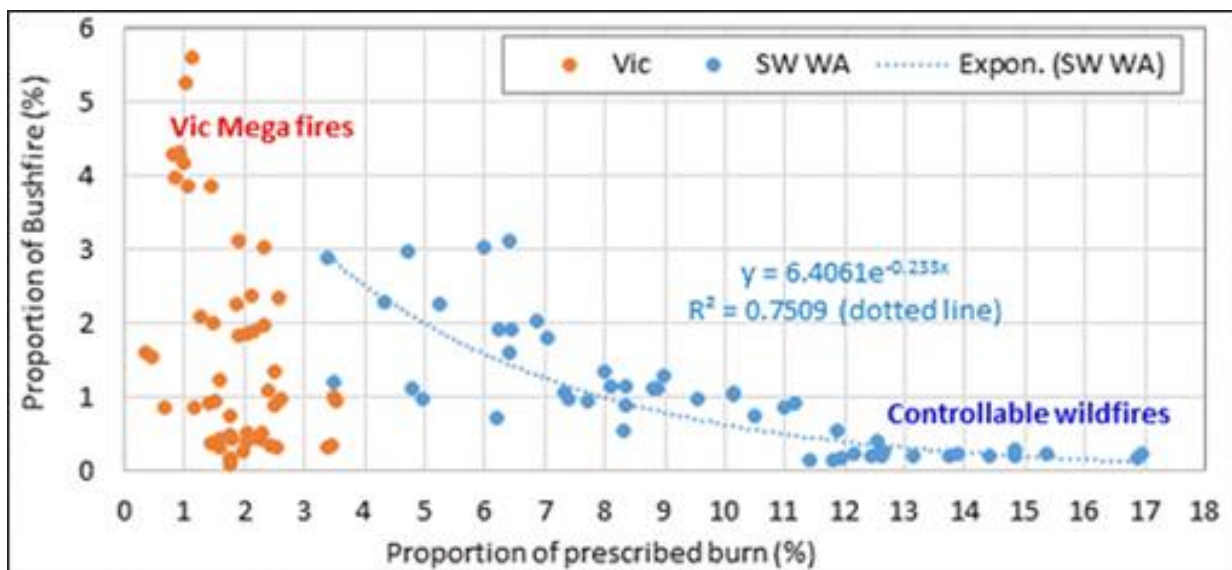
Fire losses over the last 20 years are due to poor policy and ineffective strategy - inability to deliver focus, low cost or differentiation (best in class) and insufficient focus on the critical success factors for effective land management (fuel, access etc.) required to protect life, assets and ecosystems from high intensity wildfires.

The 'Forestry Plan' fails to acknowledge the long lead times, low returns and huge issues and challenges associated with ramping up plantation supply, and is likely to lead to worse rather than better ecologically sustainable development and the promised \$110 million is insufficient.

a) The extent of the decline of Victoria's biodiversity and the likely impact on people

- The high intensity wildfires over the last 20 years (2003, 2006, 2007, 2013, 2014 and 2019-20) have burnt extensive areas - several fires burnt over 1 million ha (Submission 471, Fig 13).
- These wildfires have had an undesirable impact on Victoria's biodiversity and ecosystems.
- They have caused billions of dollars in economic loss and 183 lives lost.
- These high intensity large fires were predictable (**Figure 1**), avoidable (**Figure 2**) and are the result of poor policy and practise.

Figure 1: Victorian mega fires could have been predicted from the "Sneeuwjagt curve"³



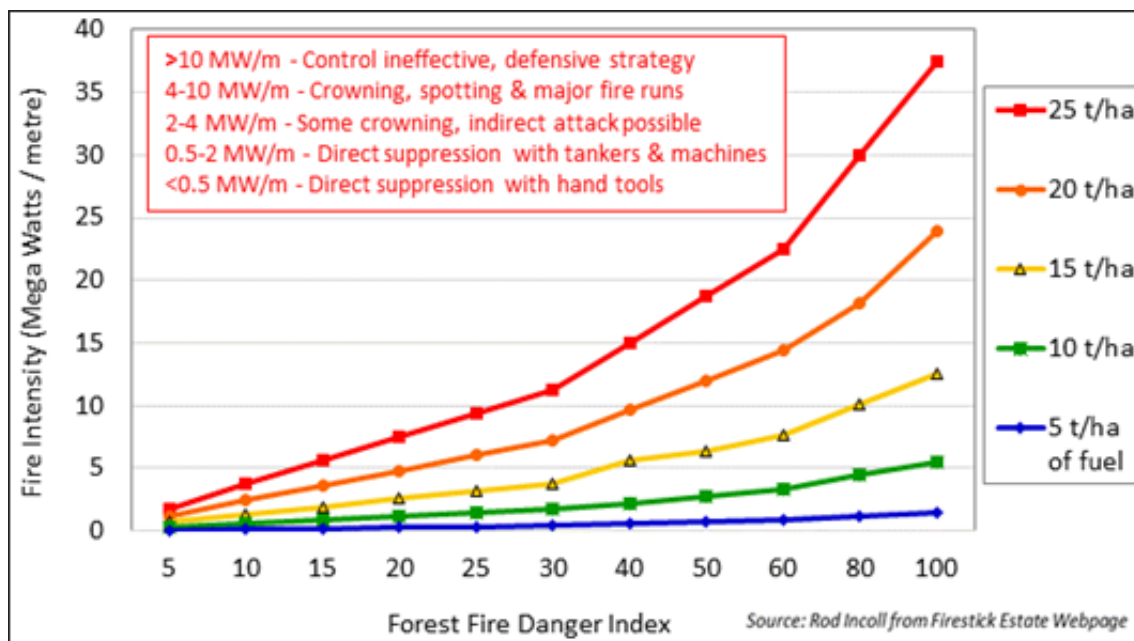
¹ John Cameron (Dip Hort. Burnley, MBA Monash & tertiary units in economics, maths & statistics) is a forestry and business consultant previously holding positions in General Management, Corporate Development and Research in forestry and forest products and a Fire Controller in a CFA Industry Brigade. Former roles include Chairman of Private Forestry Gippsland, Chairman Southern Tree Breeding Association, Chairman Australian Research Group on Forest Genetics, Board Member CRC for Forestry Hobart & CRC for Pulp and Paper Science Monash. Consulting experience includes socio-economic studies, feasibility of plantations substituting for native forest timber, appraisal of farmland for plantations, financial returns from plantations, impact of plantation and native forest timber on the cost and quality of sawntimer and paper, improved organisational performance, practical fire mitigation and effective forest strategies and prescriptions.

² Ecologically Sustainable Management of Victorian Native Forests, Submission to Parliamentary Inquiry into Ecosystem Decline in Victoria, Prepared By: John N Cameron (Cameron Consulting), August 2020. Submission 471.

³ The figure is based on 60 years of actual data for the entire forest in both regions (rolling 4 year average with 4 year lag). Victorian data derived from Tolhurst (2007) Submission to the "Inquiry into the Impact of Public Land Management Practices on Bushfires in Victoria" conducted by the Environment and Natural Resources Committee of the Victorian Parliament; and DELWP annual reports. WA data derived and updated from Sneeuwjagt (2011). The Effectiveness of Prescribed Burning in the Control of Large Eucalypt Forest Fires. 5th International Wildfire Conference, South Africa.

Fire intensity is what kills people and is largely driven by fuel load (t/ha) rather than climate or weather (FFDI).

Figure 2: Fuel load drives fire intensity more so than Forest Fire Danger Index (or weather)



b) The adequacy of the legislative/organisational framework protecting Victoria’s environment

- Victoria’s mega bushfires were preventable with best practise fire mitigation similar to that employed in South West WA where only 2 lives were lost c.f. Vic 312 lives lost over 60 years.
- Victoria had an opportunity following the 2009 Victorian Bushfire Royal Commission, to implement improved fuel reduction, and mitigation measures, yet failed.
- There was a two week window of opportunity to control the 2019-20 bushfire with best practise fire detection, initial attack and suppression, but we failed – potential justification for a coronial inquest and class action⁴.
- Victoria’s disastrous fire record over the last 20 years is due to poor policy and deficiencies with organisational structure, systems, staffing, skill and culture of DELWP and Parks Victoria.
- Talented people in DELWP/Parks Vic could be more efficient and effective if released from the shackles of an unfocused mega Department and empowered in ‘process complete’ roles.
- Victoria needs a single Forest Fire Management organisation reporting to one Minister with unfettered control and responsibility over all public forest land, sufficient to substantially improved fire mitigation.
- This focused Forest Fire Management organisation should be a stand-alone department reporting to one Minister (and should not be embedded in an ineffective conglomerate like DELWP).
- Currently the DELWP Secretary reports to four bosses delivering deflected ministerial accountability. (Minister for Water; Minister for Energy, Environment and Climate Change and Minister for Solar Homes; Minister for Planning; and up to 30 June 2020, the Minister for Local Government).
- This DELWP Ministerial arrangement violates the Westminster system of Ministerial accountability because four Ministers are variously responsible, but none are fully ‘accountable’.
- DELWP is a cumbersome conglomerate embracing too many functions and therefore lacks ‘focus’, a cornerstone of efficient and effective organisations (current DELWP functions include climate change, energy, environment, water, forests, planning, emergency management and local government).
- Conglomerates have proved to be ineffective and were discarded by business in the 1980’s.

⁴ J N Cameron 2020. Victorian mega bushfires and Government policy and practise. Submission NND.600.00145.01 to RCNNA

- The overall governance of DELWP is by a number of management committees – governance at that management level is a recipe for protracted decision making, rather than good governance. Consideration should be given to Governance by an independent Board.
- Parks Victoria report to the Minister for Energy, Environment, Climate Change and Solar Homes - the breadth of the Ministerial portfolio delivers insufficient focus on Parks.
- The current organisational structure of DELWP/Parks Victoria has failed to adequately deal with wildfire which is clearly one of the greatest threats to life, property and ecosystems.
- Both organisations have failed to deliver effective ‘land management’ (fuel reduction, firebreaks, access), a critical success factor required to protect native forest ecosystems from damaging wildfire.

c) The adequacy and effectiveness of government programs and funding

- Government funding is generally adequate, however, outcomes and deliverables are below par because of poor organisational efficiency and effectiveness.
- An efficient and effective ‘land manager’ would have far fewer than 52% of staff in Melbourne’s CBD and much more than the 11% of field staff that DELWP have⁵.
- DELWP/Parks Victoria should introduce low-cost light aircraft equipped with heat sensing and retardant, capable of detecting and suppressing fires within minutes or hours from ignition. Fires started by overnight lightning can be attacked before dawn the next day when easier to control.
- The reliance on expensive large aerial water bombers has not been very cost-effective - they help protect assets but do not stop running head fires.

d) Legislative, policy, program, governance and funding solutions to facilitate ecosystem protection

- Victoria’s ‘Safer Together’ bushfire policy has proved to be fatally flawed.
- The Auditor General raised so many issues with the modelling of residual fire risk, underpinning the ‘Safer Together Policy’, such that the failed ‘Policy’ is not ‘fit for purpose’.
- The target of 70% residual fire risk is far too high and would be unacceptable for all other ‘fuel’ situations and is not supported by any fire behaviour experts that I am aware of.
- Achieving 70% residual risk by counting areas burnt by wildfire is a nonsense given that the objective of Safer Together was to substantially reduce wildfire. Wildfire subsequently delivers more elevated or ‘ladder’ fuel, resulting in post-fire fuel conditions that are worse than areas prescribed burnt.
- The ‘Safer Together’ policy has delivered less than 2% fuel reduction when the Victorian Bushfire Royal Commission (VBRC) recommended greater than 5% of the forest each year. The VBRC fire behaviour experts called for ca 8% in line with best practise employed in South West WA.
- Poor control of bushfires on public land continues to threaten our private plantations and farms.

e) Opportunities to restore Victoria’s environment and increasing and diversifying employment

- Scrap the ‘Forestry Plan’ which is essentially a ‘media release’ on compensation for closing the native forest timber industry in 2030 and the ‘token’ establishment of plantation on marginal sites.
- Continuation of sustainable harvesting of some native forests will deliver a mix of native forest age classes and genetic recombination, both desirable for adaptive ecosystems.
- This will provide continuing diversified rural employment and help stave off ‘economics of underdevelopment’ facing rural communities, particularly ‘timber towns’.
- It will also avoid the adverse impact on scale economies in agriculture under the ‘Forestry Plan’ which is based on converting large areas of farmland to plantations.

⁵ DELWP 2018-19 Annual Report

- It will also avoid the undesirable substitution of native timber with building materials that are less ecologically sustainable, because they archive less carbon, consume more energy in manufacture and release more emissions.

f) Other related matters.

There are numerous challenges in replacing native forest Eucalypt timber with plantation timber⁶:

- The greatest challenge with plantations is the long lead time to final harvest (ca 30 years), scarce land, high costs and relatively low investment returns.
- In Victorian and particularly Gippsland, plantation area and future plantation supply are declining.
- This is evidenced by zero net new planting in the region and increased fire loss.
- Area and log supply from Eucalypt plantations are declining rapidly, with major grower's clearfelling and converting most Eucalypt to pine plantations or farming.
- Area and log supply from softwood plantations has plateaued and may decline.
- Plantation hardwood or softwood timber is no substitute for timber harvested from native forests and is inferior for sawntimber⁷.
- Small holdings and high land cost make it very difficult to acquire land for new plantations, particularly for Eucalypts with their high site requirements (deep soil and high rainfall).
- There is a potential adverse impact of increased plantations on stressed water catchments⁸.
- With respect to Eucalypt plantations for sawntimber, considerable challenges include securing sufficient land to establish a large enough plantation, to ensure a large enough log supply to support a mill of sufficient scale, and to justify the considerable investment in new reconfigured mills to handle the poorer size and quality of plantation grown logs⁸.
- Native forest timber is a far more ecologically sustainable building material than plantation timber which requires intensive cultivation, weed control, fertiliser and silvicultural inputs.
- In Europe, 80% of their native forests are available for sustainable wood production under 'multiple use' compared to only 6% of native forest in Victoria⁹.
- Most European countries are targeting increased wood production from their native forests, given the improved sustainability of using more wood including for bioenergy⁹.
- Implementation of the 'Forestry Plan' will replace one of our most ecologically sustainable industries with a less sustainable, more costly and higher risk plantation-based industry.
- In Australia there are more failed or sub-economic Eucalypt plantations than successful ones. MIS companies charging huge fees and leveraging off favourable tax advantages still failed.
- Replacing 1 million m3 currently supplied from native forest, requires ca 70-140,000 gross ha and an investment of \$1 to \$1.5 billion in land and plantation costs over ca 30 years.
- This investment is unlikely to be completed and the 'Forestry Plan' will result in the use of more imports with high 'timber miles' or less sustainable building materials and further adverse socioeconomic impacts for Victorian 'timber towns'.

⁶ Comments based on over 50 years working in forestry throughout Australia and studies of plantation development in NZ, Fiji, USA, Canada, Chile, Brazil, Uruguay, South Africa, Zimbabwe, UK, France, Spain, Portugal and Morocco; and assessing the potential of about 1000 properties in Gippsland for pine and Eucalypt plantation development.

⁷ Feasibility of plantations substituting for timber currently harvested from Melbourne's water catchments. Phase 1 – Resource and Timber Properties Report prepared by John Cameron and Rod Meynink MBAC Consulting Group for Department of Sustainability and Environment. 2008.

⁸ Feasibility of plantations substituting for timber currently harvested from Melbourne's water catchments. Phase 2 Markets, supply, land and water. Report prepared by John Cameron and Rod Meynink MBAC Consulting Group for Department of Sustainability and Environment. 2008.

⁹ P. Hopkins, Timberbiz 12/7/20.