

SUMMARY OF THE ANALYSIS OF PUBLIC SUBMISSIONS ON THE DRAFT FIRE MANAGEMENT POLICY

This document analyses submissions to the Department of Conservation and Land Management's Draft Fire Management Policy.

The Draft Fire Management Policy was released for public comment on 27 February 2004 for a period of two months. Following the release of the draft policy, advertisements were placed in local and State newspapers advising that the Draft Fire Management Policy was available for comment. It was distributed to State Government departments, tertiary institutions, conservation groups, industry groups, local authorities, and individuals. The policy was also made available on the Department of Conservation and Land Management's website 'Naturebase'.

Comments have been summarised and grouped so that comments addressing a similar issue are considered together. Where comments contained in these submissions improve the policy, amendments to the final policy document will be made.

Method of Analysis

The submissions were reviewed as follows:

1. Public submissions were summarised to allow analysis.
2. The submissions were assessed using criteria listed below:
 - 2.1 A commitment to amend the policy was made if the submission
 - (a) provided additional information of direct relevance to the policy;
 - (b) provided additional information on affected user groups of direct relevance to the policy;
 - (c) indicated a change in or clarified legislation of direct relevance to the policy;
 - (d) proposed strategies that would better achieve policy goals or objectives; or
 - (e) indicated omissions, inaccuracies or a lack of clarity.
 - 2.2 No commitment was given to amend the policy if the submission:
 - (a) clearly supported the draft policy;
 - (b) offered a neutral statement, or no change was sought;
 - (c) addressed issues beyond the scope of the policy;
 - (d) made points that were already in the policy, or had been considered during policy preparation;
 - (e) was one amongst several widely divergent viewpoints received on the topic and recommendation of the draft policy was still considered the best option;
 - (f) contributed options that were not possible (generally due to some aspect of existing legislation, Government or Departmental policy).

Comments made in submissions have been assessed entirely on the cogency of points raised. No subjective weighting has been given to any submission for reasons of its origin or any other factor that could give cause to elevate the importance of any submission above another.

Number and Origin of Submissions

The number and place of origin of submissions are listed below:

	Number	Percentage
CALM	2	8
Government agencies	2	8
Community organisations	11	44
Industry organisations	3	12
Individuals	7	28
Total	25	100

A list of the submitters to the Draft Fire Management Policy is given in Appendix 1.

Analysis Table

The analysis table contains:

- A topic heading representing the summary of concerns;
- A summary of each comment made on that topic;
- An indication of whether or not the comment resulted in a commitment to amend the policy;
- A discussion on why the comment did not result in a commitment to amend the policy or an indication of what action is intended to amend the final document; and
- The criteria by which each comment was assessed.

1. Focus on prescribed burning/ hazard reduction

Summary of comment	Amend Y/N	Discussion/Action	Criteria
Continued focus on hazard reduction using fuel loading theory as a trigger to prescribed burning.	Y	Will review document to ensure that all land management objectives and risk mitigation options are provided for.	1e
Concerned that the policy is encouraging prescribed burning which we believe is in contradiction with CALM's primary objective to conserve our native fauna and flora.	N	Has been considered during policy preparation.	2d
Support the document and its commitment to prescribed burning and wildfire suppression.	N	Support the draft policy.	2a
Strongly opposed to controlled burning as an un-natural impost on the WA environment.	N	Has been considered during policy preparation. Fire management, including appropriate prescribed burning regimes, is necessary to conserve biodiversity.	2d
Does not support deliberate burning of forests – believes it to be an un-natural and dangerous activity.	N	Has been considered during policy preparation. Fire management, including appropriate prescribed burning regimes, is necessary to conserve biodiversity.	2d
Does not believe burning protects biodiversity.	N	Has been considered during policy preparation. Fire management, including appropriate prescribed burning regimes, is necessary to conserve biodiversity.	2d
Fire management should meet multiple objectives (biodiversity) not just fuel management. Strongly in favour of small mosaic burns under mild conditions.	N	Has been considered during policy preparation.	2d
Concerned at the emphasis on prescribed burning as the primary means of protecting communities from wildfires. Do not agree that prescribed fire is compatible with biodiversity conservation.	N	Has been considered during policy preparation. Fire management, including appropriate prescribed burning regimes, is necessary to conserve biodiversity.	2d
Stated strongly an opinion that prescribed fire was not natural and not acceptable because it destroys biodiversity and should be abandoned.	N	Has been considered during policy preparation. Fire management, including appropriate prescribed burning regimes, is necessary to conserve biodiversity.	2d

2. Lack of performance standards/indicators

Content	Amend Y/N	Discussion/Action	Criteria	
No clear performance indicators for the policy that allow assessment of outcomes and compliance with policy objectives.	Y	The purpose of the policy document is to provide guidance to managers. It is not intended to be prescriptive. Performance indicators are more relevant to the strategies used to achieve policy objectives. Performance indicators for strategies and tactics used to achieve the primary objectives will be developed for annual reporting purposes.	2e	
Want measures of financial efficiency for fire management expenditures.	Y		2e	
Policy lacks performance standards by which CALM can compare actual performance.	Y		2e	
Does not provide clear outcomes or performance indicators in relation to wildfire risk management, community safety, biodiversity and sustainability. Needed to assess compliance.	Y		2e	
Policy fails to establish performance standards and mechanisms for independent monitoring, audits and public reporting.	Y		2e	
Policy paper is devoid of hard commitments.	Y		2e	
Does not mention targets for prescribed burning or how they are to be derived. It is unclear where accountability lies within CALM for fire management – this needs to be stated clearly.	Y		2e	
Would like to see some effectiveness criteria for prescribed burning in terms of strategic protection afforded to the community.	Y		2e	
Suggest 'Best Practice' criteria be included.	N		Has been considered during policy preparation.	2d
Input vs outcome management – the policy requires endorsement of annual burning program by Corporate Executive but should also require Corporate Executive to be concerned with outcomes (quality and quantity compared with targets, fires, staffing, funding, liaison etc).	N		Inputs and outputs of the fire management program are approved and monitored by the Corporate Executive at regular intervals.	2d

3. Terminology

Content	Amend Y/N	Discussion/Action	Criteria
The use of consistent terminology throughout the document supported by a glossary of terms is needed.	Y	The document will be reviewed for consistent use of terminology. Terminology will conform to the Australasian Fire Authorities Council (AFAC) glossary of terms.	1e
Concerned with the consistency of use of terminology and its meaning e.g. Community asset, property, cultural and property values, property and services etc seem to be used randomly.	Y		1e
Use of jargon in the paper – would not be understood by people outside the Department.	Y		1e
Terminology 'fuel load' is used consistently but fuel is not seen to be 'habitat'.	Y	Where appropriate text will be altered to make meaning clear within the context of its use.	1e
5.1. point 3 – what is meant by 'random wildfire'.	Y		1e
Uncomfortable with the word 'sufficient' to describe the level of protection to be afforded life and assets.	Y		1e
Deplore 'loose terms' such as "frequent fires" which are undefined and open to interpretation.	Y		1e

4. Risk assessment based on A/NZ Standard for Risk Management

Content	Amend Y/N	Discussion/Action	Criteria
There is no relationship between arbitrary targets (200,000ha burn/yr) and genuine risk analysis.	Y	<p>The Department currently utilises a Wildfire Threat Analysis process as a decision support tool for planning prescribed fire programs. It is a component of a risk management model.</p> <p>The Australian Standard for Risk Management AS/NZS 4360 will be referenced as the standard applicable for use in determining risk and risk mitigation for fire events that may impact biodiversity and community asset values.</p>	1d
Fire management should be based on Australian Standard for Risk Management AS/NZS 4360.	Y		1d
Policy should be based on a new approach to wildfire risk assessment and management which is based on the Aust/NZ standard for risk management.	Y		1d
Wildfire impacts need to be put in perspective with other natural impacts (flood, hail damage etc).	Y		1d
The objective of the wildfire management policy should be to minimise the risk of wildfires. Risk should be defined in terms of likelihood and consequences. A wildfire management policy must encompass far more than recipes for prescribed burning and fire suppression.	Y		1d

5. Resilience of communities for wildfire and personal responsibility

Content	Amend Y/N	Discussion/Action	Criteria
People living in fire vulnerable areas need to take responsibility for their own protection.	Y	<p>CALM has no statutory or jurisdictional authority to directly affect measures that would make the community more resilient to, or accountable for, the impacts of wildfire.</p> <p>The Department does, however, work closely with agencies and organisations that carry such obligations to ensure cooperation across jurisdictional boundaries.</p> <p>The document will be amended to make this limitation clear.</p>	1e
Wildfire management must involve a range of measures to minimise the risk of wildfire, including making communities resilient.	Y		1e
A great deal more emphasis needs to be put on to the principle of duty of care for property planners, developers and landowners (large and small) to accept responsibility for their role in fire prevention Every council should be provided legally binding detailed requirements for fire prevention techniques, which must be acknowledged and carried out throughout the time of their tenure.	Y		1e
Recommend activities to regulate and educate the community regarding protecting themselves and assets from fire – encourage those who wish to live in fire prone areas, to recognise the danger and take more responsibility for fire control and prevention – suggest appropriate legislation for new building permits to local government etc.	Y		1e

6. Traditional/ Aboriginal burning practices

Content	Amend Y/N	Discussion/Action	Criteria
<p>If as stated in the draft fire management policy 6.1 the Department has the objective to replicate traditional (i.e. Aboriginal) burning practices in some cases, a definition of traditional practices must be included The validity of this approach is questioned.</p>	N	Policy commits to consult and involve traditional owners. It commits to 'traditional burning practices' only where considered appropriate. This is likely to be applicable mostly in the more remote areas of the State.	2d
<p>Concerned that CALM consult with aboriginal people on traditional burning practices and publish the findings.</p>	N		2d
<p>Questions the validity of pursuing 'aboriginal burning 'practices - Just because Aboriginal People have subjected this fragile continent to fires for hunting purposes does not make it right, as they have altered many ecosystems.</p>	N		2d
<p>Questions the validity of pursuing 'aboriginal burning 'practices - History is used as an excuse for CALM fires because Aborigines have done it for 40,000 years, if this is so how did they control their fires? I would suggest that the aborigines in these circumstances would have burnt themselves out of existence with dense and larger expanses of forest and no fire retardants for controlling them.</p>	N		2d
<p>Concerned at the reference to aboriginal burning and the inference that it may be appropriate in some way to emulate it in today's disturbed and fragmented environment.</p>	N		2d

7. Climate Change, Greenhouse gasses and carbon cycling

Content	Amend Y/N	Discussion/Action	Criteria
Climate change is noted in an appendix but is not specific about fire and climate change.	Y	Climate change and related issues such as greenhouses gasses and carbon cycling will be investigated and incorporated into future planning for fire management where reasonable and practicable.	1e
Strongly suggest that the policy should make the linkage between enhanced greenhouse effect and its likely effect on wildfire frequency and intensity.	Y		1e
Concerned about global warming and its interaction with fire management.	Y		1e
Concerned about climate change and fire management.	Y		1e
Greenhouse is fast becoming a huge threat to forest ecologies, leaving the dilemma of an increasingly dry landscape (with consequently increasing fire risk) which is even more vulnerable to degrading impacts such as fire.	Y		1e
Global climate change will increase the number of days or very high/ extreme fire danger and resorting to more burning in the face of such changes, is irresponsible.	Y		1e
Greenhouse emissions from CALM's prescription burning have been reported as generating 40% of Western Australia's total emissions. This problem should be accounted for in the policy Greenhouse predictions are being realised in the south-west of Western Australia. These must be addressed in the policy.	Y		1e
Maintenance of global carbon cycles is not addressed.	Y		1e

8. Endorsement of annual program by the Conservation Commission

Content	Amend Y/N	Discussion/Action	Criteria
It should also be required for the Conservation Commission to endorse the annual burn program.	N	The functions of the Conservation Commission do not include approval of operations undertaken by CALM.	2f

9. Independent auditing, reporting and monitoring

Content	Amend Y/N	Discussion/Action	Criteria
... draft policy does not alleviate this concern as it fails to establish performance standards, and mechanisms for independent monitoring, audits, public reporting and other internationally accepted measures of transparent accountability for bushfire outcomes within CALM.	Y	The policy will be amended to ensure that CALM develops a regular audit program to monitor the extent to which fire management conforms to policy and practices. The Department will cooperate with any independent audits of its performance.	1e
Policy does not outline a procedure for independent monitoring, auditing and public reporting.	Y	The Department currently publishes fire management achievements and statistics in the annual report.	1e
We believe it is essential to have external independent monitoring of the implementation of CALM's bushfire management plans and operations.	Y	The fire management policies of CALM have been subject to internal and independent external audit and review, for example by the Auditor General and the Environmental Protection Authority.	1e
We believe that there should be a public report in May of every year by an independent Auditor.	Y		1e
Monitoring should be undertaken by external person/s.	Y		1e
Incorporate fire monitoring into ForestCheck monitoring process.	N	Aspects of fire management are presently accommodated in the ForestCheck monitoring process.	2d
The audit by the Conservation Commission should be carried out on an annual basis with audit results published in CALM's annual report.	N	This is a decision for the Conservation Commission and is beyond the scope of the policy.	2c
Requires post burn monitoring against burn objectives to be done and made public.	N	Addressed in policy.	2d

10. Education and Awareness for community

Content	Amend Y/N	Discussion/Action	Criteria
Recommend activities to regulate and educate the community regarding protecting themselves.	Y	The policy will be amended to include a commitment to undertake, facilitate and cooperate in activities designed to increase community understanding and awareness of fire management issues. The Department currently publishes some fire educational material but its availability to the public may be limited.	2d
To enable a partnership to be formed, with all those as mentioned bodies, they must be informed and educated about safety from fire and conservation of biodiversity.	Y		2d
Want a fire and environment pamphlet for fire brigade members to allow advice to be given to the public.	Y		2d
Wants information provided to community and fire brigades to allow them to make the best decisions about what and when to burn for different flora and fauna.	Y		2d
A good education program highlighting fire prevention and management techniques is important especially in areas where fire poses a significant risk.	Y		2d
Encourages a substantial public education program on fire and fire management to engender public support for CALM.	Y		2d
Commends CALM on its fire forum that allowed alternate viewpoints to be voiced.	Y		2d
Public education needs to be a priority – written in plain English with simple, honest terminology (firebreaks = fire access tracks).	Y		2d

11. Public consultation on burning program

Content	Amend Y/N	Discussion/Action	Criteria
Policy neglects consulting/coordinating with neighbours (volunteers) in association with controlled burns.	N	The draft policy commits to consultation with traditional owners, community and specific stakeholders.	2d
Local knowledge (neighbours) is important in fire prevention programs – requires consultation.	N	Addressed in policy.	2d
Good Neighbour policy and access to CALM lands needs incorporation into the policy.	N	The fire policy is compatible with the (draft) good neighbour policy.	2d
Advocates public consultation at all stages of fire policy and fire management plan preparation.	N	Addressed in policy.	2d
The policy should include a commitment to prior liaison with Government agencies and other key stakeholders before controlled vegetation burns.	N	Will specifically address liaison with agencies.	1e
Suggests – District prescribed burning plans shall be referred to the local regional office of the Department of Environment (DoE) for comment prior to their implementation.	N	DoE will be invited to provide input along with other stakeholders.	2d

12. Need for two policies – prescribed fire and wildfire

Content	Amend Y/N	Discussion/Action	Criteria
CALM should have two policies, one a wildfire management policy, the other a policy on prescribed fire (burning).	N	The draft policy addresses the integration of all aspects of fire management on all lands for which the Department is responsible for fire management.	2d
Fire suppression issues are of such importance that this draft policy needs to be supplanted with separate rangeland and UCL policies.	Y	Policy will be amended to incorporate a statement on the Department's responsibility for fire management on unallocated Crown land, unmanaged reserves and rangelands.	1e

13. Concerns regarding impact of prescribed burning on wildlife and habitat

Content	Amend Y/N	Discussion/Action	Criteria
Mosaic burning needs to be far enough apart to allow fauna to escape into unburnt areas which can supply shelter and food for them ...	N	The conservation and maintenance of biodiversity is a keystone of the draft policy.	2d
When a fire line is constructed on other than CALM lands as well as other lands, who is responsible to rehabilitate it?	N	Addressed in policy.	2d
Concerned about habitat tree destruction as part of mop up.	N	Addressed in policy.	2d
Concerned about the immediate lethal impact of the prescribed fire on fauna and flora.	N	The conservation and maintenance of biodiversity is a keystone of the draft policy.	2d
Concerned that fire may affect fauna and the ecosystem services that they provide.	N		2d
Believes small fires that provide a mosaic of burnt and unburnt under cool burning conditions are better than intense fires at a large scale.	N	Policy requires fire regimes to conserve biodiversity as per the principles for fire management.	2d
Concerned at the immediate fatal impact of fire on wildlife.	N	Considered in policy development.	2d
Concerned about the impact of prescribed fire on the build-up of litter and humus and its value as habitat.	N	Considered in policy development.	2d
Objects to regeneration burning as ineffective and damaging.	N	Not supported by research findings and practice.	2d
There is, as yet, no definitive proof that prescribed burning does not adversely affect the biodiversity of an ecosystem.	N	Not supported by research findings and practice.	2d
Concerned that the effect of fire on wildlife appears to be of minimum concern in the policy.	N	The conservation and maintenance of biodiversity is a keystone of the draft policy.	2d
Concerned that the use of prescribed fire too frequently (as it is applied presently) is damaging biodiversity.	N	Considered in policy development.	2d
Not convinced that prescribed fire provides protection to communities and in fact has a detrimental impact on the environment.	N	Not supported by operational experience.	2d
Concerned about too frequent burning and its impact on plant species and biodiversity.	N	Considered in policy development.	2d
Do not support spring burning – support autumn mosaic burning.	N	Considered in policy development.	2d

14. Whole of government bushfire policy (need for and integration with)

Content	Amend Y/N	Discussion/Action	Criteria
Concerned at a lack of a State Bushfire Policy to coordinate Ministerial responsibilities for fire.	N	Is beyond the scope of a policy for an individual government agency.	2c
Would welcome CALM acceptance of the consequent need for a new initiative to prepare a comprehensive Western Australian bush fire policy that recognises the responsibilities of all relevant agencies and the private sector to cooperate effectively in both administration and management of bush fires.	N	As above.	2c

15. Working arrangement with fire authorities and volunteers

Content	Amend Y/N	Discussion/Action	Criteria
The point about working arrangements with fire authorities and volunteers should be afforded more priority.	Y	Policy will be amended to address the reliance and partnerships with volunteers that are required for effective fire management across the State.	1d
Local knowledge of landowner volunteers in controlling fires needs to be clarified in the policy.	Y	Amend policy to recognise the value of local knowledge in fire management.	1d
Policy should detail duty of care provisions in relation to volunteers.	N	Considered in policy development. Is a legal/procedural issue addressed in operational documents and not pertinent to a policy level document.	2d
Suggests – CALM may supply fire management services, e.g. controlled burning, fire suppression to land encompassing native vegetation that is owned or controlled by State Government agencies, where practical and on a negotiated cost recovery basis.	N	Draft policy does not prohibit these arrangements and they will be considered on a case by case basis.	2d
The policy needs to deal more specifically with interagency agreements to cover situations where there is overlapping jurisdiction or interest or risks.	N	Obligations under Statute, Common law and State Emergency Management Arrangements and detailed interagency agreement define obligations across jurisdictions.	2c
Recognise volunteers in the policy statement as well as FESA and LGAs.	Y	Volunteers involvement will be recognised in policy statement.	1d
Involvement in the developing working arrangements for fire suppression.	N	Supports the policy.	2b

16. Role, responsibility and accountability across agencies (CALM/FESA/FPC/others)

Content	Amend Y/N	Discussion/Action	Criteria
Who is in charge of fire management in CALM? Where does accountability reside? This remains unclear, and is a critical issue ... Unfortunately for good fire arrangements there is a complex overlapping of responsibilities and relationships between Conservation Commission, CALM and the Forest Products Commission.	N	Accountability for all Departmental policy and performance resides with the Executive Director. Obligations under Statute, Common law and interagency arrangements define obligations across jurisdictions.	2c
The policy needs to deal more specifically with interagency agreements to cover situations where there is overlapping jurisdiction or interest or risks.	Y	Policy will be amended to embrace a coordinated approach to fire management across government.	1e
Policy should address CALM's role in achieving a coordinated approach to fire management across government.	N	Coordination is dealt with in operational documents.	2d, 2c
The draft document focuses on native vegetation with no mention of fire management in plantation estates.	N	The policy applies to all values on land managed by the Department including plantations.	2f
Policy does not specifically mention the need for specialised fire management in regrowth forests.	N	Regrowth is considered as one of the many values of a forest.	2d
The draft policy does not clearly identify whether FPC or other industries are involved in implementing CALM's Fire Management Policy or planning processes.	N	The implementation of the policy will involve a number of stakeholders and is dealt with by detailed operational arrangements guided by the policy.	2c
FPC interests in silvicultural burning, FPC asset protection and FPC staff involvement in fire management need to be addressed by policy and at a lower tactical level of documentation.	N	The implementation of the policy will involve a number of stakeholders and is dealt with by detailed operational arrangements guided by the policy.	2c

17. Sufficient resources to implement the policy

Content	Amend Y/N	Discussion/Action	Criteria
Policy does not address how CALM will deal with the resource shortage resulting from the down sizing of the timber industry.	N	This is dealt with in operational arrangements that are guided by the policy.	2c
A government and a government agency committed to the protection and maintenance of biodiversity must provide the funding necessary to achieve this objective. No matter how good the policy, it is useless if the resources to implement it are not made available.	N	As for any policy objective of the Department, the resources made available by Government influence its achievement. A policy can provide guidance and priorities on how available resources are to be committed. It cannot guarantee the quantum of those resources.	2c
Concerned for several years about the extent to which CALM has continued to report that fuel reduction burning program targets are not being met In the rangeland and on UCL this threat is increasing	N		2c
Concerned about the continuing scale and frequency of unplanned wildfires of human origin in the rangeland and on UCL particularly in the Pilbara and Kimberley regions – and how CALM is to deal with this.	N		2c
The implementation of these objectives by CALM is likely, however, to remain problematic as long as its bush fire management and response budget remains insufficient.	N		2c
Concerned at poor resourcing of fire fighting personnel and equipment throughout the Wheatbelt as opposed to the south-west.	N		2c
The Department of CALM need funds to be increased substantially to do their job effectively.	N		2c

18. Forest (Southwest) centric – rangelands, bioregional approach?

Content	Amend Y/N	Discussion/Action	Criteria
Overemphasis (explicit and implicit) on 'forests'.	Y	The draft will be reviewed to ensure the language and text indicates clearly that the policy is applicable to all areas of the State.	2e
Fire suppression section is SW centric and does not adequately address rangeland and UCL.	Y		2e
Policy fails to differentiate between different areas of the State when addressing the use of fire – particularly agricultural and pastoral areas.	N	The policy must be relevant to fire management in all areas of the State and does not focus on regional differences.	2d
Prefer to see a transparent overarching policy document that addresses objectives and key policies and identifies components of best practice and ecological principles supported by separate strategic approach for each major region/land system.	N	Considered in policy development.	2d

19. Legal basis for policy

Content	Amend Y/N	Discussion/Action	Criteria
Concerned at the inadequacy of the legislative base for CALM fire management on CALM land and UCL.	N	The policy must conform to the existing legal setting in which it operates. Recent reviews of fire management in WA have highlighted this issue for attention by Government.	2c

20. Alternatives to prescribed fire

Content	Amend Y/N	Discussion/Action	Criteria
Why has the globally time-tested fuel reduction role of livestock grazing, especially in plantations and on the rangelands, not been recognised in the policy?	Y	Policy will be amended to include reference to all methods of fuel management.	1d
Alternate strategies to prescribed fire need to be addressed such as re-introduction of native mammals to reduce the fuel load, or a commitment to work closely with surrounding property owners to reduce the potential fire hazard of weeds across boundaries.	Y		1d
The Policy does not mention the option of bushfire mitigation by measures other than using fire.	Y		1d

21. Skills and knowledge required to implement the policy

Content	Amend Y/N	Discussion/Action	Criteria
Need scientific input to prescriptions.	N	Addressed in policy.	2d
Request assurance from CALM and the Conservation Commission of WA that their senior officers possess adequate bush fire control experience and expertise to manage and protect Western Australia's diverse man made and natural environments.	N		2d
Comments that to implement prescribed fire requires knowledge and experience.	N		2d
Supportive of ICS system and minimum levels of training and competency.	N		2a

22. Frequent fire and weed invasion

Content	Amend Y/N	Discussion/Action	Criteria
Concerned about weed invasion after fire in the urban interface.	N	Addressed in policy.	2d
Section 4 does not include reference to CALM's Environment Weed Strategy or the State Weed Plan.	N	This section refers to other Departmental policy.	2f
Weeds need to be considered in all fire management not just that occurring in fragmented landscapes or surrounding urban or agricultural areas (s5.1).	Y	Policy will be amended to reflect weeds and fire interactions across the State.	1e
Concerned about frequent fire and weed invasion changing fire regimes.	Y		1e
Concerned about weed and fire regime interactions.	Y		1e
Weeds - such as wilding pines, Tambookie grass and Buffel grass - need to be considered in fire management.	Y		1e

23. Fire management and dieback

Content	Amend Y/N	Discussion/Action	Criteria
Concerned about the relationship between fire management and dieback.	N	Addressed in policy.	2d

24. Reduction of arson

Content	Amend Y/N	Discussion/Action	Criteria
Fires are a fact of life in Australia and the situation will get worse with weeds, climate change and the growing number of arsonists with arson being a major concern.....arson increased around 2000% in 30 years.	N	Arson reduction is addressed in the policy and applies to all areas of the State where CALM has an interest in fire management. CALM works closely with FESA, local government and the police in arson prevention initiatives.	2d
Increasingly our bushlands and forests are being attacked by arsonists.....encourage working closely with FESA and Kings Park to support their community education programs.	N		2d
Enforce the lighting of fires on CALM land, is a serious criminal offence and under the CALM Act -- penalties are increased substantially.	N		2d
Concerned about the continuing scale and frequency of unplanned wildfires of human origin in the rangeland and on UCL particularly in the Pilbara and Kimberley regions -- and how CALM is to deal with this.	N		2d

25. Improved detection and response

Content	Amend Y/N	Discussion/Action	Criteria
Believes improved detection and suppression response is better than controlled burning.	N	Detection and response to wildfire is balanced with hazard reduction and other risk mitigating strategies.	2d
A more rapid response by CALM when dealing with forest fires.	N		2d
Restrictions on campfire and closing parks in high fire danger times.	N		This is current practice.

26. Air quality and impacts on human health

Content	Amend Y/N	Discussion/Action	Criteria
On occasion smoke from CALM fires will create hazards to people in populated areas.... Puts unreasonable health worries on people that suffer from asthma and like illness Air pollution created by CALM fires is something our atmosphere does not need	N	Addressed in policy. Smoke management guidelines are currently in place to minimise the impact of smoke from Departmental fire activities.	2d
In relation to the impact of smoke impacting on population centres recognises the importance of this consideration, however, trusts that the "potential impact" is not used as an excuse to reduce prescribed burns.	N		2d
Suggests – prescribed burns will be managed to minimise the risk of smoke causing detrimental health impacts to the community and sensitive areas through the application of smoke management guidelines.	N	Considered in policy development.	2e
It is imprecise to refer to bushfire smoke as an 'atmospheric pollutant'. The health risks are not established beyond doubt, and in any case, occasional smoke is a trivial issue compared with other real pollutants.	N	Considered in policy development. Smoke from all sources is considered an atmospheric pollutant. Relative impacts of bushfire smoke on health are currently being researched.	2d
Concerned about the impact of smoke on air quality and human health of the local community.	N	Considered in policy development.	2d
Human health issues (both long and short term) resulting from exposure to smoke, ash and carcinogens during and after prescribed burns should be addressed in the policy.	N	Considered in policy development.	2d

27. Prescribed burning and community protection – Dwellingup royal commission etc

Content	Amend Y/N	Discussion/Action	Criteria
<p>Would like to see some effectiveness criteria for prescribed burning in terms of strategic protection afforded to the community.</p>	N	See Issue 2. above.	2d
<p>Using the disastrous fires at Dwellingup as a reason to continue the CALM prescribed burns is unfounded. A Royal Commission into the fires at Dwellingup stated that most of the forest around Dwellingup division had been control burnt in recent years.</p>	N	The Royal Commission report has been considered in developing the application of prescribed burning in WA and its relative importance in the fire management policy.	2d
<p>It must be recognised that hazard reduction burning alone will not significantly reduce wildfire risk and losses. Research has shown that the risk from wildfires can not be significantly reduced through hazard reduction burning, even if it is undertaken a very frequent intervals. One such example is Dwellingup in Western Australia, which was destroyed by wildfire in 1961.</p>	N	Strategic fuel reduction has been demonstrated to materially assist in the prevention of harm to communities from wildfire. Policy addresses fire suppression and wildfire prevention and a number of strategies to achieve these outcomes.	2d
<p>Not convinced that prescribed fire provides protection to communities and in fact has a detrimental impact on the environment – Prescribed burning will have no pre-emptive effect on the frequency or malignancy of wildfires as evidenced by the Dwellingup fires (1961).</p>	N	This view is not supported by research findings and operational experience.	2d

28. Policy priorities

Content	Amend Y/N	Discussion/Action	Criteria
Concerned that the policy focuses on impacts on the environment and not enough on the legal obligation to prevent impacts on neighbouring lands.	N	Considered in policy development. Both issues are addressed.	2d
Policy five needs to clearly state the order of priorities.	Y	Priorities will be clearly stated.	1e
Policy places protection of biodiversity above protection of property – suggest (1) life, (2) property, (3) environment.	Y		1e
Fire policy needs to reflect the use of fire for silvicultural purposes.	N	Addressed by policy.	2d
Policy states an inflexible set of priorities from life to cultural and property values etc. Suggests a more flexible approach based on risk and consequence be adopted.	Y	Although the protection of human life will remain the first priority, the policy will be amended to reflect the protection of biodiversity, cultural and property assets on the basis of risk and consequence.	2d
Section on use of fire puts too much emphasis on management of biodiversity whilst not also emphasising the other land management objectives mentioned.	N	Considered in policy development.	2d
The principles offered emphasise protection and biodiversity. This section could be improved by referring to other land management objectives.	N	Considered in policy development.	2d

29. Targeted research and the Incorporation of research findings and adaptive management outcomes

Content	Amend Y/N	Discussion/Action	Criteria
Need to include reference to incorporating the latest research on impacts of fire on biodiversity.	Y	The policy will be amended to incorporate this.	1e
No mention made of using adaptive management principles to incorporate new findings.	N	The adaptive approach to fire management is outlined in the attachment to the policy.	1e
Concerned that little research has been done on the effects of hazard reduction burning and advocates more targeted research.	N	A considerable body of research has been conducted into prescribed burning.	2d
Call for targeted research into fire, <i>Phytophthora cinnamomi</i> , nutrient cycling and mycorrhiza	N	Research in these areas is ongoing.	2d
Favour large 'no burn' areas for benchmark and research purposes.	N	The policy includes reference to Scientific Reference Areas.	2d
Calls for a moratorium on prescribed burning until it is proved that it does not cause a loss of biodiversity.	N	Inconsistent with Government policy.	2f

30. Fire Suppression Chemicals

Content	Amend Y/N	Discussion/Action	Criteria
Concerned about the negative impacts of fire suppression chemicals (retardants and foams) on wildlife.	N	The policy deals with environmental care during fire suppression.	2d
Use of chemical fire suppressants.	N	The policy deals with environmental care during fire suppression.	2d

Appendix 1

Submitters to the Draft Fire Management Policy

Individuals	Val May Jennifer Catalano Astrid Herlihy John B Clarke AG Thomson R Whittle Margaret Pieroni
CALM	Tony Start Geoff Stoneman
Community organisations	WA Forest Alliance Earth Chidlow Bush Fire Brigade Conservation Council Friends of Fitzgerald River National Park Inc Environmental Weeds Action Network WA Wildflower Soc Eastern Hills Branch Bushfire Front Inc Preston Environment Group Northcliffe Environment Centre Inc Association of Volunteer Bushfire Brigades of WA Inc
Industry organisations	Forest Industries Federation WA Inc Pastoralists and Graziers Association WA Farmers Federation
Government Agencies	Department of Environment Forest Products Commission