



Dear Commissioners

**Re: Royal Commission into National Natural Disaster Arrangements**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide input into the Royal Commission into National Natural Disaster Arrangements (Royal Commission).

The 2019-2020 bushfires of southern and eastern Australia were unprecedented in terms of the scale, intensity and fire behaviour. They had a devastating impact on life and property, local economies, health of communities in major cities and on threatened species and ecosystems.

ALCA represents a substantial collective of land restoration and conservation organisations working with landholders on privately owned and managed land across Australia. Our members are non-advocacy organisations and together represent a substantial and growing voice in Australia's land management sector.

ALCA members are:

- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- Greening Australia
- Landcare Australia
- Nature Foundation SA
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)

Together ALCA members work across over 3 million square kilometres, with more than 3000 landholders. We have over 50,000 supporters and combined annual turnover exceeds \$200 million. ALCA and its member organisations are working to support some of the most pressing conservation issues across the country – including assisting conservation landholders recover from bushfires, restoring endangered ecosystems, building the protected area estate, and using natural solutions to tackle climate change. We are actively developing policy around these issues, and providing leadership on the development of innovative finance mechanisms for conservation.

Thousands of conservation landholders in southern and eastern Australia have been impacted by the 2019-2020 fires. These property owners protect and manage significant areas of important biodiversity and carbon values on their properties for the benefits of all Australians.

ALCA recognises the role of climate change and its impacts in contributing to the frequency, intensity, timing and location of bushfires and other natural disasters, and the predicted contribution of climate change and associated impacts to future bushfires and other natural disasters. While the role of climate change policy is not being considered as part of this Royal Commission, the role and effectiveness of climate policy is as important as matters such as hazard reduction in considering the future resilience of our forested landscapes.

## Response to terms of reference

### TOR f (i): Ways in which Australia could achieve greater national coordination and accountability with respect to land management, including hazard reduction measures

ALCA acknowledges the sanctity of human life and the importance of the protection of built assets and supports science-based hazard reduction burning, where this reduces this risk. We also support ecological burning and cultural burning activities.

However localised hazard reduction should not be conflated with land clearing.

Protecting, improving and managing Australia's remaining native vegetation is critical to effective carbon storage and climate regulation and assists in preventing or lessening the impact of climate change-induced natural disasters.

Thus, while sharing of techniques and measures to reduce fuel load and wildfire risk is desirable across land and fire management agencies, any move to national standards or rule-making must:

- place good science at the heart of such standards. Fuel and fire behaviour vary between different vegetation types, and the ability to apply different fuel reduction techniques will depend on multiple factors including vegetation type, topography, access, weather conditions, among others.
- ensure that fire management responsibilities remain in control of the agencies which have the expertise, on-ground capacity and local knowledge of specific areas and communities.
- Recognize the value of landscape scale, cross-tenure fire planning and preparedness activities (including fuel load/hazard assessment and reduction) that are science based.
- consider the local ecological, cultural and social landscape context in any fire prevention, mitigation or response and be strategically focused to protect life and assets.
- be adequately resourced.

In addition, publicly available fire history data and mapping (such as that provided by North Australia and Rangelands Fire Information website <https://firenorth.org.au/nafi3/>) could be improved and extended across Australia as it would provide opportunities for significant improvements in fire planning and the management of future bushfire risks across different land tenures. Improving funding for and access to fire history data and mapping will also assist to identify and protect long unburnt habitats which will be critical for conserving biodiversity into the future.

### TOR f (ii): Ways in which Australia could achieve greater national coordination and accountability with respect to wildlife management and species conservation, including biodiversity, habitat protection and restoration

Private landholders are now more than ever critical to the protection and management of species and ecological communities, in burnt and unburnt habitats. As noted above, with every large wildfire event, the relative value of the remaining unburnt native habitat increases. Our natural, cultural and biodiversity assets are not finite.

ALCA recommends enhanced protections, planning and coordination to:

- reflect greater recognition, and ultimately protection, of Australia's irreplaceable biodiversity assets;
- ensure that continued or responsive removal of vegetation limits the further loss of critical

habitat or refuge;

- ensure fire suppression activities (e.g. extensive use of dozers, or the pushing of mature trees) minimise their impact on threatened or critically endangered ecological communities, soil and water resources.

In relation to bushfire recovery, ALCA supports the protection of key habitats to aid recovery, in line with the recommendations of the Commonwealth Government's Wildlife and Threatened Species Bushfire Recovery Expert Panel which identified 'Protecting unburnt areas within or adjacent to recently burnt ground that provide refugia' as one of the top priority activities to prevent extinctions and maximise the chances of long-term recovery of native species and communities.<sup>1</sup> The importance of refugia was also recognised by State government responses (e.g. Victoria<sup>2</sup> and New South Wales<sup>3</sup>). This can be achieved in a range of ways, including:

- updating critical habitat listing processes under the EPBC Act to recognise the relative value of unburnt areas following extreme bushfires<sup>4</sup>;
- implementing invasive predator and herbivore control to reduce the pressure on recovering forests; and
- using of conservation agreements and covenants on private land with willing landholders to support recovery and best practice land management into the future.

Resources are needed now and ongoing to support private landholders in implementing effective fire recovery and future fire mitigation efforts to protect our biodiversity values. Mechanisms for private landholders to access funding and resources to coordinate and support their rapid responses to wildfire events need to be improved.

Greater coordination around biosecurity (including during fire suppression activities) remains critical to ensure the prevention of and response to weeds and feral animals post-fire. This needs to be adequately resourced at appropriate locations and scale for greatest impact. As noted above, landscape-scale, cross-tenure fire planning and preparedness activities are critically important to ensure the protection of critical habitat, wildlife or unburnt refugia. This planning should consider:

- embedding ecological experts into fire planning activities and fire-fighting control centres; and
- early consideration of environmental assets and scenario planning for appropriate mitigations to protect these (aligned with any Act or regulation).

Identifying these environmental assets on maps that are available to all levels of firefighting response, before and during fire events, is important. Renewed mapping and analysis of the 2019-2020 bushfire impacts on our understanding of wildlife distribution and abundance and ecological function will

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<sup>1</sup> Wildlife and Threatened Species Bushfire Recovery Expert Panel, "Communiqué 15 January 2020"  
<https://www.environment.gov.au/system/files/pages/effd94e2-00fc-4e4b-8692-941f90f5ad8c/files/communique-15jan2020.pdf>.

<sup>2</sup> Department of Environment, Land, Water and Planning (DELWP), *Victoria's Bushfire Emergency: Biodiversity Response and Recovery. Phase 1* (Department of Environment, Land, Water and Planning, Melbourne, 23 January 2020)  
[https://www.wildlife.vic.gov.au/\\_data/assets/pdf\\_file/0034/449746/Victorias-bushfire-emergency-Biodiversity-response-and-recovery-Version-1-23-January-2020.pdf](https://www.wildlife.vic.gov.au/_data/assets/pdf_file/0034/449746/Victorias-bushfire-emergency-Biodiversity-response-and-recovery-Version-1-23-January-2020.pdf)

<sup>3</sup> Department of Planning, Industry and Environment (DPIE), *Wildlife and Conservation Bushfire Recovery Immediate Response January 2020* (Department of Planning, Industry and Environment, Sydney, 2020)  
<https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Fire/wildlife-and-conservation-bushfire-recovery-immediate-response-january-2020-200027.pdf>

<sup>44</sup> Fitzsimons, J.A. (2020) Urgent need to use and reform critical habitat listing in Australian legislation in response to the extensive 2019-2020 bushfires. *Environmental and Planning Law Journal* 37: 143-152.

support further and future investment efforts.

TOR (f) (iii): land-use planning, zoning and development approval (including building standards), urban safety, construction of public infrastructure, and the incorporation of natural disaster considerations

Best available bushfire and climate change science will increasingly be needed to inform planning decisions relating to proximity, buffering and building standards, particularly in higher risk interfaces between urban development and forested areas.

With more extreme fire events becoming more prevalent with climate change, some properties may not be defensible (by emergency services) due to access and location. This might be particularly so for isolated or remote properties surrounded by forested public land. Following other bushfire events (e.g. 1983 Ash Wednesday bushfires in Victoria), buy-back programs were developed for high risk properties that had natural vegetation and strategic future public land values. A nationally coordinated buy-back program from willing landholders could be initiated to achieve multiple aims, including reducing risk for landholder and emergency services, consolidating public land blocks, and increasing connectivity and/or representation in Australia's protected area estate.

TOR (g): Any ways in which the traditional land and fire management practices of Indigenous Australians could improve Australia's resilience to natural disasters

ALCA recognises that fire has been used as a management tool for tens of thousands of years by Aboriginal people and that there is much to gain from a shared learning approach to land management. The implementation of 'right way fire', cultural burning or Indigenous land management can provide opportunities for improved land management, the protection of natural and cultural values and enhanced social outcomes for Aboriginal people.

ALCA also recognises the demonstrated outcomes of current Indigenous land and fire management approaches in various locations around Australia in climate change mitigation, reducing the impacts of wildfire and in social and cultural connection (e.g. savanna burning in northern Australia). Opportunities to understand, demonstrate and integrate

ALCA supports more coordinated, resourced and systematic efforts to understanding and demonstrating the increased application of Indigenous land, water and fire management practices, including cultural burning. In regions where new, large-scale cultural burning operations are proposed to be used or reinstated, ensure science, consultation and clarity of purpose to accurately assess benefits to culture, biodiversity, carbon and hazard reduction and the differences between current hazard reduction and/or ecological burning undertaken by land management agencies.

We welcome steps to further integrate the experience and expertise of Aboriginal people in land management and fire mitigation, preparedness and suppression activities and call for commensurate funding to do so.

Australian Land Conservation Alliance