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A/Senior Fire Management Officer – Planning
Fire Management Unit
Department of Environment, Water and Natural Resources
GPO Box 1047
Adelaide SA 5001

January 22, 2014

Re: Comments on Draft Fire Management Plan – Central Eyre Peninsula

Dear Sir/Madam,

The Nature Conservation Society of SA (NCSSA) welcomes the opportunity to contribute to the development of the Fire Management Plan for the Central Eyre Peninsula. As South Australia's primary nature conservation advocacy organisation, the 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 and the management of protected areas.

Since 1962, NCSSA has played a key role in establishing and expanding the reserve system in South Australia by promoting the protection of key biodiversity assets through the dedication of reserves and by undertaking ecological research to inform their management. Our current and past activities also address the significant need for ongoing management within parks and ongoing engagement with and education of the wider community. We also have a strong interest in the biodiversity conservation values of Hincks and Hambidge Wilderness Protection Areas and the Hundred of Blesing where the NCSSA conducted our annual biological surveys between 1966 and 1968.

Please refer to the following pages for our comments on the draft Fire Management Plan for the Central Eyre Peninsula that we hope are useful in finalising the plan. If you would like to clarify or discuss any of the points raised please contact me on (08) 7127 4633 or via email at nicki.depreu@ncssa.asn.au

Yours sincerely,

Nicki de Preu
Conservation Ecologist
Nature Conservation Society of South Australia

NCSSA comments: Draft Fire Management Plan – Central Eyre Peninsula

General Comments

The NCSSA consider the draft plan to be comprehensive and generally well written and adequately researched, however, make the following comments and recommendations in terms of specific areas. The NCSSA strongly recommends that the plan acknowledges the WildEyre program - a major, community driven, landscape-scale conservation initiative that has been underway in the central northwest Eyre Peninsula since 2007. Stakeholders in the WildEyre program have developed a Conservation Action Plan (CAP) for the region, parts of which overlap with the Central Eyre Peninsula planning area. The CAP has identified a range of ecological assets that could easily be incorporated into the fire management plan and used to inform future management of the area.

Specific Comments

Executive Summary

Page i, Paragraph 3: The NCCSA agrees with the statement that the Central Eyre Peninsula planning area includes large contiguous areas of remnant native vegetation however we strongly recommend that the fragmented nature of these remnants is also recognised in this section. In terms of the landscape context, many of the reserves covered by this plan are the only significant remnants of intact native vegetation in an area where there has been widespread clearing for agriculture and/or grazing of remnant native vegetation by domestic stock.

Page iii, Paragraph 2: The NCSSA has concerns regarding the timeframe for major review of this plan given the area of prescribed burning planned by DEWNR and likelihood of bushfires in the planning area during this time. The statement 'or earlier if required' should be clarified in terms of what factors might trigger an earlier review of the plan.

Contents

Page v: Fire Management Maps

Although it is useful to have interactive maps available online the NCSSA also strongly recommend that copies of the maps referred to in the document are included in the final plan for ease of access and reference.

1. SCOPE AND PURPOSE

Page 6: The NCCSA strongly support the need for comprehensive fire management planning to address the occurrence of species, populations, and ecological communities of conservation significance within the plan area. We also support the intention of reducing the potential impacts to biodiversity as a result of any reserve burning in its entirety in a single fire event by limiting the area impacted by bushfires.

1.1 Objectives

Page 7: General Objectives for Fire Management

The NCSSA strongly support the inclusion of the environment as an asset to be protected from the risk of bushfire events alongside life and property. We also strongly support the objective to apply sound conservation and management principles during fire management activities and taking an adaptive management approach to fire management supported by relevant research.

Page 7: Objectives for Fire Management in the Central Eyre Peninsula planning area

The NCCSA support the listed objectives for fire management on the Central Eyre Peninsula, in particular dot points 2, 3, 4 & 5. We recommend that non-government organisations are included in dot point 7 in addition to universities and research organisations that can assist with developing research programs to inform prescribed burning on public land. The NCSSA has established a number of permanent monitoring sites in the planning area for Bushland Condition Monitoring and Woodland Bird Surveys as part of the WildEyre program that could potentially be used to inform prescribed burning programs.

2.3.1 Land management

Page 8: The NCSSA strongly recommends that this section of the plan acknowledges the WildEyre program, a major community driven landscape-scale conservation initiative that has been underway in the central northwest Eyre Peninsula since 2007. We also recommend that this section acknowledge the draft Management Plan for Eastern Eyre

Peninsula Parks that is currently in development and Landscape Linkages Plan that has been developed by Greening Australia as a component of the WildEyre program.

2.6 Plan review and currency

Page 10: We reiterate our comments from the Executive Summary (*Page iii, Paragraph 2*) regarding timeframe for major review of the plan and clarification of what factors might trigger an earlier review.

3.1.2 Surrounding Land Use

Page 13: The NCSSA supports the statement that remnant vegetation outside of the DEWNR managed land occurs on privately-owned farm properties confined to small isolated blocks, roadsides and creeklines and recognition that these areas often experience long periods without fire. The NCSSA strongly recommends further acknowledgement of the importance of these areas in terms of biodiversity conservation values in a fragmented landscape such as the Central Eyre Peninsula. These areas provide a significant corridor of remnant vegetation in the district that should be considered as a key environmental asset in the planning area along with old growth woodland habitat that provides an important refuge for fauna species. This section should also acknowledge that the area forms an important part of the East meets West NatureLink and the WildEyre program and that collaboration across park boundaries and adjacent landholding should be considered wherever possible to achieve biodiversity outcomes.

3.6.4 Natural Values

Flora, Fauna and Ecological Communities

Page 20, Paragraph 1:

NCSSA recommends that the plan states the Biological Database of South Australia also contains records from the BirdLife Australia database that are regularly updated that could provide important information for fire management planning.

The NCSSA acknowledge the considerable data that is available in relation to species, populations and ecological communities of conservation significance in the planning area however believe that this section should also acknowledge the existence of additional datasets and local landholder and specialist knowledge that are not currently accessible in the Biological Database of South Australia. The NCSSA have established and re-monitored BCM sites on a number of key landholdings in the planning area with data stored within a specifically designed database. The NCSSA has also established a Woodland Bird monitoring project as part of the WildEyre program that is potentially useful for informing fire management planning. We would strongly recommend that this data is acknowledged and ongoing monitoring of these sites is included as a priority in the management plan along with adequate resourcing for such programs.

Page 20, Last Paragraph:

The NCSSA support DEWNR's commitment to increasing its capacity to incorporate species' requirements into improved ecological fire management. We recognise that the actions in this plan relate specifically to fire management actions on DEWNR-managed land, however, we recommend revising the wording of the last sentence to strengthen the commitment of DEWNR to working with the community on landscape-scale biodiversity conservation.

Page 20-22: Malleefowl & Sandhill Dunnart

The NCSSA strongly support the management strategies for Malleefowl and Sandhill Dunnart to protect critical habitat and prevent local extinctions from a single bushfire event. We recommend that the plan refer to identified priorities within existing Recovery Plans and Conservation Advices for these species and future management aim to address these priorities. The aforementioned *Landscape Linkages Plan* developed for the region incorporates distribution models for these and other species as key assets in the landscape.

Page 22: Threatened Orchids

The NCSSA support the management strategies for Threatened Orchids within the planning area. We strongly recommend that the plan refer to existing Recovery Plans and Conservation Advices for species that occur in this area and, wherever possible, address identified priorities from these documents.

Page 22, Paragraph 4: Threatened Orchids

The NCSSA support the statement that "fire management strategies may be used to enhance populations of Threatened Orchids" and recognise the challenges involved in improving habitat quality post-fire when increased grazing pressure can impact on regeneration of native vegetation. The NCSSA strongly recommend that the plan

acknowledge the increased risk to orchid species from burning during the growing season between April and November a critical period in terms of overlap with the timing of prescribed burning programs. We also question whether post-fire predation is a critical issue to be considered for threatened orchids (last sentence) and whether this should actually refer to grazing pressure from introduced and native herbivores.

Page 23: Semi-arid mallee and fire history

The NCSSA strongly support the protection of old growth mallee vegetation and the critical habitat that it provides for fauna as a high priority for the plan. We recognise the role of fuel reduction in protection of such areas and as a means of preventing reserve-scale fires, however would recommend that further detailed mapping of old growth mallee is undertaken to identify priority areas for management.

3.7 Abundant and Pest Species Management

3.7.1 Fauna

Page 24: The NCSSA strongly supports the statement that overabundant native species can impact dramatically on the post-fire recruitment of flora species and the need for an appropriate management method to be identified prior to undertaking any prescribed burning activities.

Although the feral animals that occur in the planning area have been listed in this section, not all these species are present in all the lands included in the plan. The NCSSA recommends inserting an additional table as an Appendix showing the feral animals that occur by Reserve/landholding.

The NCSSA agree that “prescribed burning provides opportunities for research and monitoring into how pest fauna respond to and impact on native species post-fire” however, to be effective, there needs to be a commitment to ongoing monitoring and resourcing of such programs and the plan should acknowledge this fact. We also consider that the wording of this sentence could be misinterpreted to justify a prescribed burning program that is obviously not the desired objective. We would recommend that this sentence be reworded to state that prescribed burning practices can provide opportunities for research and monitoring to be undertaken to inform and improve the management of flora and fauna post fire.

3.7.2 Flora

Page 24: The NCSSA strongly supports the statement that “Weeds can have significant impacts on native vegetation and ecological communities within remnants, and may impact fauna by changing habitat composition and functionality”. We recognise the complex ecological interactions between fire and weed infestations and support an integrated approach to weed management involving the planned use of fire coupled with minimum disturbance weed control techniques. We commend DEWNR for noting that the combination, timing and application of methods are critical for minimising off-target damage.

The NCSSA recommends a further statement in this section that recognises that prescribed burning practices can provide opportunities for research and monitoring to be undertaken to inform and improve the management of flora post fire. Such monitoring is a critical part of improving our understanding of the role of fire in managing weed infestations in native vegetation. The NCSSA also recommends there needs to be a commitment to ongoing monitoring and resourcing of such programs acknowledged in the plan.

3.7.3 Plant Pathogens

Page 26: The NCSSA supports the proposed management strategies to minimise the risk of Phytophthora infestation and spread in DEWNR reserves from the use of plant and equipment sourced from southern parts of Eyre Peninsula where it is thought to occur.

4.1.1 Fire Management Blocks

Page 27-28: The NCSSA recognises the importance of subdividing the Central Eyre Peninsula planning area into management blocks to ensure that information and issues unique to a particular area have been addressed. We would strongly recommend that this section also acknowledges the importance of connectivity between the various areas particularly in relation to remnant native vegetation and species, populations and ecological communities of conservation significance in the planning area.

5. Readiness

5.3.3 Fire Management Zones

Page 34: The NCSSA support the listed objectives for Conservation-Land Management Zone in the draft plan.

5.3.5 Prescribed Burning in C-zones

Page 36: The NCSSA strongly support the proposed amendment to prescribed burning in C-zones as a result of unplanned fires or other factors such as prolonged drought or unsuitable weather conditions.

Page 37: The NCSSA support the proposal to carry out prescribed burns within C-zones for landscape protection purposes to reduce the likelihood of a whole reserve or large contiguous block of vegetation burning in a single fire event. The NCSSA strongly recommends that the protection of old growth mallee vegetation and the critical habitat that it provides for fauna is acknowledged in this section of the plan.

5.4.2 Interpreting Ecological Fire Management Guidelines

Page 40:

TABLE 7 – ECOLOGICAL FIRE MANAGEMENT GUIDELINES FOR FIRE-PRONE MVS IN THE PLANNING AREA

The NCSSA strongly recommends that the guidelines ecological fire management and prescribed burning be informed by the best available knowledge/science. It is not clear how these figures have been derived or what information they are based on but we would recommend that regular review as new knowledge becomes available. The NCSSA strongly recommends that this should be clearly stated in the plan.

7 RECOVERY, RESEARCH AND MONITORING

7.2 Research

Page 43: The NCSSA supports the identified priorities in terms of research into the effects of fire with particular emphasis on species and ecological communities with conservation ratings within the planning area.

7.3 Monitoring

Page 43-44: The NCSSA consider the statement that 'Implementation will depend on state and regional priorities and available resources' to be inadequate in terms of the objectives of the plan. If we are to improve knowledge about the response of species, communities and habitats to fire, effective pre and post-fire monitoring is an essential part of that process and should be adequately resourced to achieve meaningful adaptive management.

Appendix 1 - Assets and Strategies for Risk Mitigation

Page 52-61: The NCSSA strongly recommend further reference and links to identified priorities within the WildEyre Conservation Action Plan in this section of the FMP.

Appendix 3 - Fire Response of Rated, Significant and Introduced Flora Species

Page 63-68: In terms of clarity, the NCSSA would strongly recommend that Fire Response of Rated and Significant Flora Species should be included in a separate Appendix from Introduced Species.

We also strongly recommend that further information for all rated species should be included in the column titled 'Considerations for Fire Response Management'. This information may be available from existing Recovery Plans, Conservation Advices or through reference to other similar species until more specific information is gained.

Appendix 4 - Fire Response of Rated and Significant Fauna Species

Page 69-72: The NCSSA recommends further details in relation to breeding, species ecology and fire response of rated bird species could be supplemented with information from relevant Recovery Plans and Conservation Advices for nationally listed species and/or the Handbook of Australian & New Zealand Birds.

The NCSSA advise that the EPBC rating for the Slender-billed Thornbill (western) has been removed in the most recent review of these ratings and therefore should be amended in the Table.