



VICTORIAN
NATIONAL PARKS
ASSOCIATION



Destruction from the Longwood/Ruffy Bushfire, Jan 2026. PETER BRIDGES

SUBMISSION TO

Inquiry into the 2026 summer fires across Victoria

8 May 2026

Victorian National Parks Association

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Victorian National Parks Association (VNPA) submission to the Inquiry into the 2026 summer fires across Victoria

VNPA is an effective and influential nature conservation organisation. We work with local communities, scientists and government to advocate for evidence-based policy to safeguard wildlife, habitat and protected areas. We inspire connections with nature through citizen science, activities, action and education for all Victorians. We've led the creation, oversight and defence of Victoria's natural estate for over 70 years.

[Link to TOR](#)

TERMS OF REFERENCE

(1) the preparation and planning by government, emergency services agencies and the community ahead of the fire season, including management of public and private land and roadsides;

(2) the causes and circumstances of the bushfires, including climate change and the adequacy of the Government's climate policies and actions, forecasts, warnings and public education on bushfire threats;

(3) funding, equipment and appliances for the Country Fire Authority (CFA), Fire Rescue Victoria and Forest Fire Management Victoria, and recruitment and retention of CFA volunteers;

(4) the emergency responses to control and contain the fires, including adequacy of resources and communications;

(5) resilience of critical services and infrastructure such as electricity, water and telecommunications during and after the fires;

(6) the impact on the community, business and agriculture and efforts to aid in recovery;

(7) the impact on the environment, including native wildlife, and any measures to better protect native forests, including technology for early detection and firefighting in remote locations;

(8) the impacts of climate change on the natural environment, which has resulted in more frequent and intense bushfires occurring in Victoria;

(9) the prevalence and impact of misinformation leading into and during the fire season;

(10) the interjurisdictional support into and out of Victoria leading into and during the fire season, including interstate and international deployments, Commonwealth support and relief efforts; and

(11) lessons from and progress on the implementation of recommendations from previous inquiries, reports and Royal Commissions

Recommendations

- There is a need for a cross-benefit analysis between burning programs and implementation of nonburning risk reduction techniques and strategies such as slashing, fire bunkers and sprinklers
- Need to support implementation and support for cultural fire use by Traditional owners including pre and post survey work on ecological response to cultural fire and long-term funding of Traditional Owners to plan, implement and study cultural fire techniques outside of the Department of Energy, Environment and Climate Action (DEECA).
- There is strong need for independent oversight of Forest Fire Management Victoria (FFMV) operations and planning particularly those that replicate forestry operations
- The overuse of prescribed burning of large areas of public land including national parks is leading to the simplification of ecosystems, collapse of critical habitat such as hollow bearing trees and old growth forest and decline in wildlife numbers, reducing the resilience of ecosystems to other shocks such as bushfires and windstorms
- There is a need for a cross-benefit analysis between burning programs and implementation of nonburning risk reduction techniques and strategies. This should include the public health and tourism loss caused by burning operations.
- Job cuts within DEECA and Parks Victoria have reduced the capacity of adequate response to emergency recovery of ecosystems and threatened species.

Victorian Context

Victoria is the most cleared state in Australia having destroyed more habitat (close to 70%) than any other State or Territory, with the remaining native vegetation largely fragmented including along roadsides¹, small reserves and parks as well as private land.

Over 2000 native plants, animals and ecosystems are listed as threatened with extinction under Victoria's nature protection laws the *Flora and Fauna Guarantee Act 1988* (FFG Act)².

Planning and preparations for fire risk is managed by DEECA under their brand FFMV across all public land including National Parks, conservation reserves and unprotected public land such as State Forests. With the Chief Fire Officer also being the manager of State Forests on top of their fire responsibilities through delegation from the director of DEECA.

Importance of Roadside vegetation (TOR 1.)

Remnant roadside vegetation provides examples of native plant communities that may be absent from adjoining cleared private land providing a valuable genetic resource and seed bank for seed collection (with appropriate seed collection permits), to help propagate local plants for revegetation projects while also providing habitat and ecological connectivity for plants and wildlife in fragmented landscapes³ as well as amenity value.

These roadsides are highly fragmented and vulnerable to destruction from road widening works and degradation through ploughing, invasive species invasion, grazing, firewood collection and climate change⁴.

In landscapes where native vegetation is sparse and the only habitat left in an area the roadsides can be of increased use by the last remaining wildlife to move between other areas of habitat such as parks and reserves in a safe and protected manner.

Roadside native vegetation is heavily impacted by poor post emergency tree removal and use of machinery within vegetated areas impeding ecosystem recovery and some cases facilitating land clearing without permits and offsets in a legally questionable manner.

¹ Remnant Native Vegetation Investigation FINAL REPORT (2011). Victorian Environmental Assessment Council (VEAC).

² Flora and Fauna Guarantee Act 1988 Threatened List (September 2025), Department of Energy, Environment and Climate Action

³ John Robinson, Upper Maribyrnong Catchment Group. The value of roadside remnant vegetation, Victorian Landcare Magazine, Issue 79. (2020)

⁴ Natural Victoria: Conservation Priorities for Victoria's Natural Heritage. Nature Conservation Review. VNPA (2014) Full Report. Victorian National Parks Association, Melbourne.

Examples of this can be found across the state including the Pyrenees Region⁵ and East Gippsland⁶ in recent years.

Instances of roadside native vegetation dampening the spread of bushfire have occurred in recent years with a greater need to quantify these instances through study and monitoring.

All the eggs in one basket: Planned Burning use in Victoria

“It’s important (fuel reduction burning), but not the panacea, and something we should have a very open and frank discussion about”- Rural Fire Service (RFS) Commissioner Shane Fitzsimmons AO AFSM (2020)⁷

Academics and conservationists have for many years voiced concern that ‘prescribed burning’ (or ‘hazard reduction burning’, ‘fuel reduction’) has been excessively relied upon as the single primary technique of fire management in Victoria.

Prescribed burning is prioritised despite the effectiveness of such activities diminishing due to climate change and limited usefulness at times of catastrophic fire conditions.

FFMV manages fire across all public land tenures in Victoria, including the use of prescribed burning, candling of trees, clearing and management of strategic fuel breaks. To date it is unclear if DEECA/FFMV has investigated at a large scale less ecologically harmful fire risk management such as slashing closer to assets, compulsory evacuation, private fire bunkers, subsidised sprinkler systems and increased and proactive rapid attack and suppression capability.

Growing evidence indicating effectiveness and ineffectiveness of safety benefits of planned burning (TOR.1,4 and 7)

There is growing evidence questioning the efficacy of large-scale fuel reduction burns on protecting life and property in Australian ecosystem types, as well growing knowledge gaps in the understanding of the effectiveness of fuel reduction burning under climate change scenarios as well as impacts on biodiversity, water purification, public health and tourism.

⁵ <https://www.thecourier.com.au/profile/1218/alex-dalziel> (2024). Raglan residents hire lawyer in battle to stop tree felling. [online] Thecourier.com.au. <https://www.thecourier.com.au/story/8616174/residents-challenge-pyrenees-shires-tree-clearing/?msg=login>

⁶ Perkins, M. (2020). Conservation watchdog investigates: Is bushfire tree removal ‘overzealous’? [online] The Age. Available at: <https://www.theage.com.au/national/victoria/conservation-watchdog-investigates-is-bushfire-tree-removal-overzealous-20200305-p5476c.html> [Accessed 7 May 2026].

⁷ Rawsthorne, S. (2020). Hazard reduction burns are ‘not the panacea’: RFS boss. [online] The Age. Available at: <https://www.theage.com.au/national/hazard-reduction-burns-are-not-the-panacea-rfs-boss-20200108-p53poq.html> [Accessed 14 Apr. 2026].

There is clear evidence that fire managers should be focused on dealing with the impacts of extreme fire weather not just real and perceived fuel levels, if the over-riding objective of fire management – saving lives – is to be substantially achieved particularly as the climate further warms.

Much of the evidence used by DECCA/FFMV to justify the over investment in one type of fire management (fuel reduction burning) over other fire management techniques and management types derives from both untested anecdotal evidence and recordings and from forestry/silvicultural based understandings of fuel management and outcomes in setting such as pine plantations which is not overly useful in many Victorian ecosystem types.

There is a need for an interdisciplinary approach to studying and implementing fire management in Victoria, with much needed on understanding the impacts on ecosystem function and resilience, wildlife health and populations, public health, tourism impacts, water quality and usefulness of different fire management techniques and the effects and efficacy of prescribed burning within various landscape contexts and on different values.

To date DECCA/FFMV have showed little if any interest in gauging the impacts of their operations once they have been completed and if those operations reduce fire risk or severity an over what period.

We will outline below and growing amount of literature on the effectiveness and usefulness of prescribed fire on reducing bushfire risk and protecting life and property:

“An increase in fuel treatment, such as prescribed burning, may reduce crown fire risk but it has also been shown that fire severity in these fires was not reduced by recent burning (reduced fuel) under very severe weather [26].”

Owen Price, Ross Bradstock. (2013). **Landscape scale influences of forest area and housing density on house loss in the 2009 Victorian Bushfires.** *PLoS One*, 8 (8), e73421-1-e73421-6.

One of the most consistent findings of research projects is that the effectiveness of any fuel reduction program is reduced considerably under severe fire weather conditions. (To our knowledge, this has not been publicly acknowledged by DECCA/FFMV)

“An increase in fuel treatment, such as prescribed burning, may reduce crown fire risk but it has also been shown that fire severity in these fires was not reduced by recent burning (reduced fuel) under very severe weather [26].”

Owen Price, Ross Bradstock. (2013). **Landscape scale influences of forest area and housing density on house loss in the 2009 Victorian Bushfires.** *PLoS One*, 8 (8), e73421-1-e73421-6.

“The results suggest that recently burnt areas (up to 5–10 years) may reduce the intensity of the fire but not sufficiently to increase the chance of effective suppression under severe weather conditions. Since house loss was most likely under these conditions (67%), effects of prescribed burning across landscapes on house loss are likely to be small when weather conditions are severe. Fuel treatments need to be located close to houses in order to effectively mitigate risk of loss.”

Owen F. Price, Ross A. Bradstock. (2012) **The efficacy of fuel treatment in mitigating property loss during wildfires: Insights from analysis of the severity of the catastrophic fires in 2009 in Victoria**, Australia. *Journal of Environmental Management*, Volume 113, 30 December 2012, Pages 146-157

Other academic papers have indicated not only that the understory regenerates soon after a fuel reduction burn, but that attention should be given to the relative flammability of the species that first recolonize the burnt landscape.

“Apart from low, dry open woodland where there was insufficient data to detect a trend, all forests were most likely to experience crown fire during their period of regeneration. The implications of this are significant for the Alps, as increasing fire frequency has the potential to accelerate by producing an increasingly flammable landscape” and “Across the Australian Alps, recently burnt forests have been on average more flammable than mature forests, consistent with historic observation and the mechanistic understanding arising from plant growth and species’ change.”

Philip J. Zylstra (2018) **Flammability dynamics in the Australian Alps**. *Austral Ecology* (2018)

Many papers have concluded that fuel reduction close to assets in need of protection, while it may be the most difficult to achieve, is the most effective – and the most cost-effective.

“Results of this study demonstrate that treatment of fuels at the interface [ie close to buildings] is not only the best means of reducing risk, it is also the most cost-effective.”

T.D. Penman, R.A. Bradstock, O.F. Price. (2013) **Reducing wildfire risk to urban developments: Simulation of cost-effective fuel treatment solutions in south eastern Australia**. *Environmental Modelling & Software* 52 (2014) 166e175.

“All fuel treatments were more effective if undertaken closer to houses. For example, 15% fewer houses were destroyed if prescribed burning occurred at the observed minimum distance from houses (0.5 km) rather than the observed

mean distance from houses (8.5 km). Our results imply that a shift in emphasis away from broad-scale fuel-reduction to intensive fuel treatments close to property will more effectively mitigate impacts from wildfires on peri-urban communities.

Gibbons P, van Bommel L, Gill AM, Cary GJ, Driscoll DA, et al. (2012) **Land Management Practices Associated with House Loss in Wildfires.** *PLoS ONE* 7(1): e29212. doi:10.1371/journal.pone.0029212.

Numerous studies have highlighted the need to assess the effectiveness of fuel reduction programs against other fire management tools. A number of papers point out that an increased emphasis on ignition management (i.e. aerial attack capability, powerline management, fire bug vigilance and surveillance) should be receiving attention in fire management policy and planning.

“The findings demonstrate that year-to-year variation in weather and the success of ignition management consistently prevail over the effects of fuel management on area burned in a range of modelled ecosystems.” ... “Weather and ignition management effort were more important than fuel management approach and effort in determining total area burned in five landscape fire models. Modelled area burned decreased with increasing levels of ignition management effort in all models. Increasing effort in a random fuel reduction approach resulted in decreased areas burned in the model systems but the effects were unimportant compared with that of varying weather and level of ignition management.”

Cary, G. J., Flannigan, M. D., Keane, R. E., Bradstock, R. A., Davies, I. D., Lenihan, J. M., Li, C., Logan, K. A. & Parsons, R. A. (2009). **Relative importance of fuel management, ignition management and weather for area burned: evidence from five landscape-fire succession models.** *International Journal of Wildland Fire*, 18 (2), 147-156.

“Despite policy imperatives to expand fuel treatment, a reduction rather than an elimination of risk will result. Multifaceted strategies will therefore be required for the management of risk.” ... “Feasible fuel treatment strategies are likely to leave considerable residual risk in many Australian forested ecosystems and this risk may be expected to increase in the future. Explicit recognition of this fundamental conclusion and its attendant consequences, including costs, will be needed to build a more comprehensive approach to the management of risks to people and their infrastructure.”

R.A. Bradstock, G.J. Cary, I. Davies, D.B. Lindenmayer, O.F. Price, R.J. Williams. (2012) **Wildfires, fuel treatment and risk mitigation in Australian eucalypt forests: Insights from landscape-scale simulation.** *Journal of Environmental Management* 105 (2012) 66e75.

There is a need for a cross-benefit analysis between burning programs and implementation of nonburning risk reduction techniques and strategies. This should include the public health and tourism loss caused by burning operations.

We will outline these below in ***Other non-burning management tools***.

Other non-burning management tools:

Compulsory evacuation

While Victoria belatedly came close to compulsory evacuation in this summer's fires, we still lack the necessary legal clout to achieve it. Fire managers should have the authority to evacuate homes, hospitals and even whole towns if necessary, and all regions should have well-developed evacuation strategies in advance of any fire season.

In the USA and Canada, compulsory evacuation is well established. In 2006, the 88,000 citizens of the Canadian town of Fort Murray were evacuated in the face of a several hundred-kilometre fire front. The town was lost, but everyone lived.

Private bushfire bunkers

The Victorian Bushfires Royal Commission found that half of the people who relied on private bunkers during the Black Saturday fires survived, but half tragically perished in them. The Commission put out an urgent interim report asking for an approved Australian standard design for private shelters, and that standard was published before the Commission's final report.

However, this critical information has never been communicated to Victorians, and there has been no support for people wanting to install approved shelters. They should, at least, be compulsory for any new building in a high fire-prone area.

Private Sprinkler set ups

Cross subsidising the cost of fire protection sprinklers for properties in high danger areas such as those programs that give rebates for solar panels.

Increase rapid attack and suppression capability

We will outline needed further investment in section below: Increase rapid attack and suppression capability

Increasing punishment for misuse of fire

Fines and jail time for those that misuse fire on times of Total Fire Ban as well as acts of arson must be increased alongside public education programs.

Despite large bushfires started near Cape Otway and other regions during the 2025/26 bushfire period no known convictions or jail have been handed out to those who misuse fire during these periods.

Greater on ground surveillance

The need for more Park Rangers and Office of Conservation Regulator staff on the ground is needed as Victoria’s population grows and technology changes.

Despite this need, Parks Victoria has its lowest number of Fulltime staff its ever had, below 1997 FTE staff levels when the organisation was started despite changes in technology and populations⁸.

Full-Time Equivalent (FTE) Staff	1998	2025	2026 additions
	913	801.1	62 (863.1)

On top of this was the sacking of 33 sacked from the Office of the Conservation Regulator (OCR) in 2024⁹.

On ground surveillance and enforcement by park rangers and conservation officers is critical in ensuring compliance with existing laws and regulations as well as setting the public standards of visitation to bushland areas and use of fire.

A lack of these critical frontline workers will lead to more illegal and damaging impacts to national parks and public lands.

Increase rapid attack and suppression capability

“To make sure that we do not miss any new ignitions, we must provide a layered ‘wedding cake’ of technologies in detectors on satellites, balloons, drones, towers and the ground. We are working on all of these opportunities and also on ways to quickly integrate the data from these,”- Dr Marta Yebra is Associate Professor in Environmental Engineering at the Fenner School of Environment & Society and the School of Engineering at Australian National University. Director of the ANU-Optus Bushfire Research Centre of Excellence

There is a need to invest in greater bushfire suppression technology and firefighting capacity such as early detection and aerial attack¹⁰ and suppression.

⁸ Analysis of Parks Victoria Annual Statements by Victorian Protected Areas Council

⁹ Eddie, R. (2024). Forest fire redundancies ‘risk emergency responses’. [online] The Sydney Morning Herald. Available at: <https://www.smh.com.au/politics/victoria/forest-fire-redundancies-risk-emergency-responses-20241008-p5kgnp.html>

¹⁰ Technological solutions for living with fire in the age of megafires Yebra, Marta et al. One Earth, Volume 7, Issue 6, 932 – 935

Victoria's aerial attack capacity has increased steadily since 2009's Black Saturday fires, but rolling out a truly effective aerial point of ignition capacity across Victoria would require long term funding, support and leadership from government at all levels.

This summer's fires play a part in the growing trend of large, landscape scale fire driven by longer and hotter summer periods and droughts, stronger wind speeds driven by high greenhouse gas emissions warming the global climate.

Rapid aerial attack and suppression capacity is a highly technological solution, but in the face of climate change, it may be the only effective way to seriously reduce the rate of fire in the landscape. We won't stop every fire, but we should set about establishing a far greater level of control than we currently have.

As technology improves so does the opportunities to keep on top of fire at the ignition points before they become large scale bushfires new ideas and tool include the following:

Drone surveillance, Drone rapid attack, Lightning mapping, real time satellite observations and advances in GIS all help to improve on-ground surveillance.

The impact of Forest Fire Management Victoria's practices on Victorian and Commonwealth listed wildlife, ecosystems and threatening processes

The overuse of fire in Victorian ecosystems is leading to a decline in some wildlife species (including once common species) as well as ecosystem resilience to bushfires, windthrow and other events. Species declining due to the implementation of inappropriate fire regimes by the State of Victoria include but are not limited to Harpin Banksia (*Banksia spinulosa* var. *cunninghamii*)¹¹, Glossy Black Cockatoo¹² and Mallee Emu-wren (*Stipiturus mallee*)¹³.

“High frequency fire resulting in disruption of life cycle processes in plants and animals and loss of vegetation structure and composition” and “Inappropriate fire regimes causing disruption to sustainable ecosystem processes and resultant loss of

¹¹ Muir, A., Bluff, L., Moloney, P., Amos, N. and Thomson, J. (2020). Hairpin Banksia: A widespread plant threatened with decline by frequent fires. Australasian Plant Conservation journal of the Australian Network for Plant Conservation, [online] 29(1), pp.9–11. doi:<https://doi.org/10.5962/p.373835>.

¹² Stock, P. (2025). Glossy black cockatoos could be pushed towards extinction in Victoria if burns go ahead, experts warn. [online] the Guardian. Available at: <https://www.theguardian.com/environment/2025/may/18/glossy-black-cockatoos-victoria-forest-burn>.

¹³ Mallee Emu-wren; Management Burning and Toxic Waste Dump Spark Concerns for a Listed Threatened Species by Simon Mustoe Director, AES Applied Ecology Solutions & Rohan Clarke Post Doctoral Fellow at La Trobe University. NUMBER 3. SEPTEMBER 2004 NATIONAL ENVIRONMENTAL LAW REVIEW

biodiversity” are both listed as Threatening Processes under Victoria environment protection law the FFG Act. Other Threatening processes exacerbated by DEECA/FFMV operations are listed below in Table 1.

“Fire regimes that cause declines in biodiversity” is listed under the Commonwealth’s *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Threatening Processes	Year Listed
High frequency fire resulting in disruption of life cycle processes in plants and animals and loss of vegetation structure and composition.	2001
Inappropriate fire regimes causing disruption to sustainable ecosystem processes and resultant loss of biodiversity.	2003
Loss of coarse woody debris from Victorian native forests and woodlands.	2003
Loss of hollow-bearing trees from Victorian native forests.	1991

To date DEECA/FFMV have been unable to provide evidence of avoiding or minimising the impact of their operations on Threatening Processes or wildlife in their operations despite attempts by community groups and academics to work together to reduce these risks.

The growing conflict between fire management and MNES has come to a head with the plan to clear many hundreds ha (if not thousands) of fuel breaks across some of our most intact area of public land and vast amounts of large and hollow trees being removed due to an intensification of tree removals driven by poor quality tree risk assessment methods and the seeming need to make work for out of work native forest logging operators.

To date the fuel break and prescribed burning operations have led to the clearing of thousands of hollow bearing trees required by many threatened species across the whole of Victoria.

Victoria has been warned for many years that the scale and intensity of its so-called fuel reduction burning operations is having a large-scale impact on MNES and ecosystem function. This includes a lack of monitoring of the impact on MNES and ecosystem responses to fire.

The reliance on one technique of fire management through fuel reduction burning is poor practice, has limited usefulness in times of extreme fire danger and has widespread negative impact on federal & state threatened species and to declines in habitat and

populations of some species. It is also undertaken with appropriate ecological oversight and transparency.

Scope of activities and need to reduce impact

VNPA has concerns about the impact of many aspects of fire operations. While we recognise the community need to contain and prevent fires, we also seek to improve ecological outcomes and reduce impacts.

Areas of fire activity which must be improved include:

- Fire response, readiness, impact and recovery
- Planned burning
 - Frequency and scale of prescribed burning
 - Scientific basis of planned burning and fuel assessment methodologies
 - Assessment and mitigation of impacts on threatened species and habitats.
- Fire preparation works, including strategic fuel breaks and storm and fire clean up
 - Thoroughness of assessment of ecological impacts and prevention measures at the right scale
 - Accountability, transparency and oversight of works
 - Responsiveness to new information (adaptive management)
- Habitat (Hazardous) tree assessment and removal.

We understand that fire response is exempted from the EPBC Act consideration. Nevertheless, there needs to be clear articulation to what activities under what circumstances are to be considered fire response.

The current situation in Victoria is that there is a degree of uncertainty and lack of clarity around when emergency periods start and stop. There is a tendency for FFMV fire response activities to blend into fire preparation activities, leading to excessive roadside clearing, habitat tree removal salvage-type logging and so on, with limited opportunities for community recourse.

It is critical that any documentation or approval under this strategic assessment clearly articulate when EPBC Act and associated agreements apply and when they don't.

Lack of monitoring around planned burning operations

The lack of long-term monitoring of the ecological and native wildlife impacts of FFMV's operations was highlighted by VAGO in its 2020 report to Parliament, *Reducing Bushfire*

*Risks, VAGO found that 'With the exception of some isolated case studies, DELWP [now DEECA] does not know the effect of its burns on native flora and fauna.'*¹⁴

A growing amount of scientific literature indicates that fuel reduction works in remote areas over thousands of hectares have limited usefulness at times of extreme or even medium bushfire¹⁵. Many studies have concluded that fuel reduction close to assets in need of protection such houses and communities is needed, while it may be the most difficult to achieve, is the most effective and the most cost-effective¹⁶.

Instead, there is a need to undertake more intense fuel reduction works including burning and slashing beside assets (100 metres around assets) such as houses and communities¹⁷.

After the 2009 bushfires, the Royal Commission recommended the need to stop building human habitation in high-risk fire areas. Unfortunately, houses are still being built in these risky areas despite repeated warnings.

Hazardous Trees vs Habitat Hollows

The removal of so-called hazardous trees before and after both bushfire events as well as fire management operations such as fuel breaks or burning operations has increased under FFMV and is a significant impact on State and Commonwealth listed wildlife and the function of Victorian ecosystems.

303 native wildlife species rely on hollows to nest, breed, shelter and feed. This includes 31% of native mammals and 15% of native birds¹⁸. Each animal species has its own requirements in terms of hollow size, location (branch or trunk), tree species, and surrounding vegetation, which affects how a hollow is used

The VNPA has put forward many alternatives to reducing the perceived and actual threat of large, old and hollowing trees based off Australian Standards and arboricultural knowledge. This report was given to FFMV and Minister, no response has ever been given to the VNPA. You can access the document *Protecting our living legacies*, is a practical policy guide to safeguarding large old trees on public land in Victoria. You can access the report [here](#).

¹⁴ Victorian Auditor-General's Office (2020) Reducing Bushfire Risks October 2020

¹⁵ Gibbons P, van Bommel L, Gill AM, Cary GJ, Driscoll DA, et al. (2012) Land Management Practices Associated with House Loss in Wildfires. PLoS ONE 7(1): e29212. doi:10.1371/journal.pone.0029212.

¹⁶ T.D. Penman, R.A. Bradstock, O.F. Price. (2013) Reducing wildfire risk to urban developments: Simulation of cost effectiveness fuel treatment solutions in south eastern Australia. Environmental Modelling & Software 52 (2014) 166e175.

¹⁷ Owen F. Price, Trent D. Penman, Ross A. Bradstock, Matthias M. Boer and Hamish Clarke. (2012) Biogeographical variation in the potential effectiveness of prescribed fire in south-eastern Australia. Journal of Biogeography (J. Biogeogr.) (2015) 42, 2234–224

¹⁸ Gibbons, P & Lindenmayer, D (2002) Trees hollows and wildlife conservation in Australia CSIRO Publishing, Collingwood, Victoria

The decline of large and old trees is happening across all land types and tenures; from the suburbs, to farms, state forests and protected areas including national parks. Management theories and actions by FFMV are in part driving this decline.

The loss of large, old and hollow-bearing trees is recognised as a key threat to native forests and woodlands according to Victoria's primary threatened species law, the FFG Act, the loss of hollow bearing trees is also implicated in the decline of hundreds of state- and federally-listed birds, mammals, reptiles and amphibians.

In a 2016, the Victorian Government Department of Environment, Land, Water and Planning (DELWP) published a report by Lucas Bluff to quantify the impact on hollow-bearing trees (HBTs) from exposure to a single instance of planned fire. It had the secondary goal of providing evidence-based options for managers seeking to reduce the impact of planned fire on HBTs and habitat loss¹⁹.

The report found that 'HBTs directly reached by fire were on average 27.9 times more likely to collapse than trees not reached by fire. While these results indicate that, in general, planned burns significantly increase the collapse rate of HBTs in comparison with that on 'no burn' control plots, the causes of variation in collapse rate can provide additional insight'.

This percentage does not include trees felled due to perceived threat to workers safety.

It remains to be seen if any of the management options outlined in Bluff (2016) for DELWP have been implemented in any way, including the further monitoring and research needed to understand the long-term impacts on wildlife including State- and Federally-listed species of the State Government's planned burning operations.

FFMV marking their own homework

The current oversight of FFMV operations, their effectiveness, impact on ecosystem function and threatened wildlife has been shown to have no independent regulation or oversight and little if any accountability.

Victoria's Office of the Conservation Regulator (OCR) confirmed that '*the Conservation Regulator does not regulate DEECA or its activities relating to fire or fuel management of public land*'²⁰. This includes operations that distinctly replicate logging operations such as those in the gazetted Wombat-Lerderderg National Park (Wombat State Forest), Dandenong Ranges National Park and Yarra Ranges National Park.

¹⁹ Bluff L 2016, 'Reducing the effect of planned burns on hollow-bearing trees'. Fire and adaptive management report no.95, DELWP, Melbourne, Victoria

²⁰ Letter from Chief Conservation Regulator to VNPA about Debris removal from Dandenong Ranges National Park

All assessments before and after FFMV fire operations are done internally (if at all) with no publicly available assessment framework or assessment. Essentially, FFMV are marking their own homework. There is no mechanism for the public to report on poor practice or detections of State and Commonwealth listed species within fire operations to DEECA, despite citizen science groups detecting MNES within FFMV operations that were undetected by FFMV.

This has led to damage, death and destruction of MNES within FFMV operations with concerns raised by citizen scientists, land managers and species experts such as zoological institutions and academics, with concerns consistently falling on deaf ears.

We welcome FFMV seeking approval of their operations through a Strategic Assessment provisions under the Commonwealths EPBC Act due to the Significant Impact their operations are having on MNES and their habitats. It is hoped this assessment will help guide genuine mitigation of the threats to MNES by DEECA/FFMV operations.

Case Study #1: Southern Greater Glider death during Forest Fire Management Victoria (FFMV) Operation, Yarra Ranges National Park

Conservationists, academics and zoologist had long raised concerns about the scale and intensity of FFMV's Strategic Fuel Break Operations across Victoria.

Because of these concerns, citizen scientists from the VNPA and Wildlife of the Central Highlands (WOTCH) surveyed for wildlife that was using the large and hollow bearing trees planned for removal by FFMV.

The groups also commissioned an independent tree risk assessment by a qualified arborist, which found most of the trees to be low risk.

Despite citizen scientists undertaking surveys, lodging the findings with State and Federal authorities, and including alternatives to the scale and impact of the operations on protected wildlife these findings were largely ignored, leading directly to at least one documented death of a Southern Greater Glider, as well as significant impact on their habitat.

Below we will outline the correspondence with the Federal and Victorian Environment Ministers and FFMV regarding concerns about the Strategic Fuel break Program in the Yarra Ranges National Park. This case also created significant public concern and public debate and highlights the current challenges with assessment and oversight.

Timeline:

- 19th December 2023. Letter to Minister Plibersek: Concerns of Significant Impacts to Matters of National Environmental Significance caused by Strategic Fuel Break operations, in Victoria's Central Highlands
- Response by Department: 26 March 2024 (Mc23-035736)
- 28th March 2024. Letters to Ministers Plibersek and Dimopoulos as well as Chief Fire Officer Hardman: Urgent: Endangered Greater Gliders recorded Denning/Nesting in Trees earmarked for Imminent Removal in Victoria's Central Highland. (This included evidence of habitation of trees to be removed including maps, GPS positions and video and photographic evidence)
- 24th April 2024 Tree Risk Assessment and Report undertaken by independent arborist
- 6th May 2024 Letter to Chief Fire Officer Hardman and Secretary of DEECA John Bradley: Contravention/s of Environment Protection and Biodiversity Conservation Act 1999 (Cth) in relation to Strategic Fuel Break Operations in Victoria's Central Highlands and expert opinion regarding tree risk including Arborist's tree risk assessment (Letter sent by Environmental Justice Australia on behalf of VNPA and WOTCH)
- 9th May 2024 Letter to Federal Environment Minister: Contravention/s of Environment Protection and Biodiversity Conservation Act 1999 (Cth) in relation to Strategic Fuel Break Operations in Victoria's Central Highlands and expert opinion regarding tree risk including Arborists tree risk assessment (Letter sent by Environmental Justice Australia on behalf of VNPA and WOTCH)
- 14th May 2024. One Southern Greater Glider found dead at a FFMV Strategic Fuel Break Operation in the Yarra Ranges National Park
- 19th April 2024 to 21st November 2024 found that close to 2000 large and hollow bearing trees had been felled within the Yarra Ranges National Park and surrounding public land as part of the SFB program.

Fire dependent grassland ecosystems neglected

Currently there is very little prescribed burning that is done primarily for genuine ecological benefit. This imbalance must be addressed.

Native grasslands and grassy woodlands do require higher levels of fire to maintain ecological function (sites burnt between 2-5 year periods), where as many Victorian forest ecosystems are being burnt too often and reducing their biodiversity both through prescribed fire and bushfire. For plantlife this is known as the Tolerable Fire Interval (TFI) burning ecosystems within that TFI will lead to species decline as they do not grow old enough to sexually produce the next generation of plants.

Many native grasslands in public ownership are deteriorating to the point of no longer meeting Federal ecosystem benchmarks because of lack fire.

Land managers and have been left frustrated by DEECA/FFMV's obstruction in planning and undertaking burns in grassland reserves and roadsides despite the cross benefit of reduce fuel risk and ecological function maintenance.

Regular burning of roadsides in Western Victoria is undertaken by predominately volunteer CFA crews and is an effective means of reducing bushfire risk. This is in part because it reduces biomass, but it is likely also in part because it shifts the proportion of native to exotic weedy grass cover. This action has the additional co-benefit of improving the health of a critically endangered ecosystem. *Phalaris* an invasive weed grows high and thick and burns at a higher temperature than native grasses.

Direction of resources put into the ecological burns that are necessary for good native grassland health which will be to the benefit of all Victorians.

The CFA also recognises roadside grassland burning as a valuable training space.

There is a need to understand the role native grasslands can play in reducing and slowing the spread of fire. This requires investigation and quantification through scientific study and publishing including First Nations Knowledge and understanding where culturally appropriate.

We note emerging evidence that the Mt Mercer fire slowed when it got to native grassland, with the likely reason being that even late in the summer the Kangaroo Grass (*Themeda* sp.) sward was green following late rains.

CFA recognises the value of native grass compared to pasture grasses such as *Phalaris*, and have a program to scrape away *Phalaris* and sow with native grasses in Western Victoria. This is a program that should be strengthened.

Economic strategies (including the subsidising of grassland protection) to minimise fire risk and spread should include providing funding and resources for improving the

function of native grasslands on private property as well as public property. This can reduce fire risk and improve biodiversity outcomes.

For an effective grassfire mitigation strategy to be developed, it is important to distinguish between native and exotic grasses. While some good mapping of the location of roadside grassland exists, especially in the west of the state, much more work needs to be done in the north and east. There is a significant funding shortfall here that can meet fire mitigation measure and improvement of largely endangered ecosystem communities.

Grassfires are usually crop fires or pasture fires, not native grassland fires, there is a need to change the narrative around what a “grassfire” really is. Correct language creates a more informed public and more effective discussion.

Farming is the main vector for grassfires in Victoria. There are far more grass-based crops than there are native grasslands across Victoria. Only 0.58% of native grasslands remain, the bulk of the 99.42% lost have been replaced by pasture or other grass-style crops, e.g. wheat.

Wildlife and Ecosystem Recovery after fire (TOR 6 and 7)

How we help ecosystems and wildlife recover following bushfire events will dictate how and if they recover now and into the future. As feral deer numbers boom across Victoria, increase in overzealous tree removal following fires the need to get recovery right immediately following fires and years after will see Victoria’s ecosystems and wildlife will continue to decline, this includes the use of planned fire.

As Victoria’s natural areas are largely fragmented and, in many cases, isolated from other areas of native vegetation the need to reduce threats such as invasive herbivore browsing by feral pigs and deer, predation by feral cats and foxes, spread of weeds into recovering areas as well as exclusion of heavy machinery from recovering ecosystems instead keeping machinery to existing tracks and trails.

Following the 2019/20 bushfires the Bushfire Biodiversity Response and Recovery (BBRR) program²¹ to support Victoria’s bushfire impacted wildlife and biodiversity was to be commended and lead to genuine conservation gains and threats reduced to surviving wildlife.

²¹ Victoria’s bushfire emergency: Biodiversity response and recovery, DEECA (2024)
<https://www.wildlife.vic.gov.au/home/biodiversity-bushfire-response-and-recovery>

There is a need for a permanent specialist team within DEECA that can implement, monitor and manage response and recovery of ecosystems and wildlife following disasters such as bushfire, windthrow storm events and floods.

Without immediate control of invasive carnivores and herbivores following bushfires leaves ecosystems highly susceptible to damage, degradation and loss. For example without vegetated cover small marsupial such as Bandicoot and Potoroos are more likely to be predated by feral cats and foxes, with herbivore damage such as from feral deer, pigs or horses this damage is caused by grazing of unburnt plants or compacting and eroding recovering soils as well as grazing of reseeded and shooting plants at their most vulnerable stage of recovery.

With the sacking of 350 DEECA staff members²², including an estimated 50% of biodiversity staff will lead to less institutional knowledge and reduced capability to respond to disaster events when they occur, with climate change increasing the frequency and intensity of these events there is a need for greater resources and investment in recovery response.

Following largescale fires in the Gariwerd/Grampians National Park and surround the VNPA along with several land holders and managers called on the State to ensure long term funding and support to eradicate feral deer from western Victoria inline with the state Deer Control Strategy. You can see the letter [here](#).

With vegetation burnt immediate aerial control of feral animals such as deer and pigs is more feasible due to increased visibility and access. While integrated control of herbivorous (deer, pigs, goats, feral horses) is undertaken post fire in some circumstances, it appears to be optional component of fire recovery on public land. It should be a routine part of post fire recovery, not an option.

Supporting native predators such as Dingo and quoll is critical to keeping feral fox, cat and rabbit numbers down or suppressed after bushfire, due to this there is a need to be highly cautious with the use of 1080 or PaPP to remove feral fox after bushfire. In places like Wyperfeld National Park-Big Desert National Park complex with a critically low number of native Dingo/Wilkerr between 40-100 individuals the use of 1080 or PaPP is unacceptable and will lead to the death of critical ecosystem functions Dingoes provide.

Supporting the Wyperfeld National Park-Big Desert National Park complex Dingo/Wilkerr with water points was a commendable post fire action by DEECA, VNPA is concerned that local academics and friends groups were not consulted with despite

²² Longmore, J. and Field, E. (2025). Victorian Department of Energy, Environment and Climate Action to cut 350 jobs. [online] Abc.net.au. Available at: <https://www.abc.net.au/news/rural/2025-08-14/350-public-service-jobs-to-be-cut-in-victoria-deeca-restructure/105652454>.

their wide range of knowledge on this critical population. This lack of consultation has led to some questionable placement of water points close to farms which is setting Dingo/Wilkerr up to fail and shows little knowledge of their behaviour and biology by DEECA that can be avoided by working with local experts and Traditional Owners.

If you seek further information please contact Parks and Nature Campaigner, Jordan Crook at jordan@vnpa.org.au or on (03) 93416500