



# Country Fire Service Volunteers Association

*Representing the interests of CFS Members*

## Submission to the Select Committee on Harvesting Rights in Forestry SA Plantation Estates



### **Overview CFS Volunteers Association (CFSVA)**

The Country Fire Service Volunteers Association represents the 15,000 volunteers of the South Australian Country Fire Service (SACFS).

The CFSVA has an agreement with the Government, in the form of a Volunteer Charter signed by the then Premier of South Australia the Hon Mike Rann, which commits the Government to consult with the Association on all matters that could be reasonably be expected to affect volunteers.

The CFSVA has been asked to provide this submission as a result of a request from the Regional Volunteer Management Committee (RVMC) for Region 5 of the SACFS. The RVMC comprises all of the Group Officers and Deputy Group Officers that manage volunteer resources in Region 5. The Region covers the area from just below Salt Creek to Bordertown and onto the Victorian border, and covers the Forestry SA Lands in question.

### **Intention of the CFSVA presentation**

The Association wishes to highlight the deficiencies in the argument provided by the SA Government and the ACIL Tasman report in respect of provision of fire fighting services for the protection of Forestry SA assets in the South East of South Australia. Additionally, we wish to highlight the potential impact on life, property and CFS volunteers as a result of the reduction in current fire fighting resources that may occur subsequent to the forward sale of forestry plantations.

The submission addresses current resourcing for SACFS & Forestry SA fire fighting, fire fighting performance of both organizations and then areas of concern.

### **Background Of Members Involved In The Submission**

Mike Kemp AFSM	Wattle Range Group Officer and Chair of the Region 5 RVMC 40 years experience as a CFS Volunteer and 25 years as Group Officer
Phil Richards	Captain, Millicent CFS Brigade 25 years experience as a CFS Volunteer, 11 years as Brigade Captain and 12 years as CFS Air Attack Supervisor primarily operating in the South East where the majority of FSA plantations exist
Wendy Shirley	Executive Director, CFSVA

### **SACFS South East Resources Within Area Of Response**

For the purposes of this document and in consideration of any statement of resources, an area from Kingston to Naracoorte to the Victorian border and south to Pt. Macdonnell is defined as the response area covering the Forestry SA plantation areas in question.

The SA Country Fire Service provides the following resources for the response area defined :

- 57 x brigades
- 70 x fire appliances
- 5 x bulk water tankers

- 2 x quick response vehicles
- 1222 x volunteer firefighters and support personnel
- Aerial firefighting – 5 x bases, 2 x spotting aircraft & 2 x bombing aircraft

The SACFS volunteers provide an all hazards emergency service including bush and structure fire, motor vehicle accident and road crash rescue, hazardous material spills, and flood and storm damage. CFS members undertake this commitment in a purely voluntary capacity, with no labour cost to the government for any aspect of their service. Indeed, there is a financial cost to them in being a member of CFS as a result of lost work time or other out of pocket expenses.

It needs to be understood that CFS volunteer numbers in the State are in decline, with some of the brigades in the centre of Forestry SA plantations almost at the point of not being viable.

Volunteer commitment to the CFS in the busiest fire danger seasons has involved the provision of 1000s of person hours as part of the wildfire fire fighting process. This commitment, along with a general decline in population resulting in less available people to join the SACFS already stretches volunteer capacity during the Fire Danger Season.

#### **Forestry SA Fire Fighting Resources Within Area Of Response**

Current Forestry SA fire fighting resources within the area of response are:

- 12 x Fire King appliances (around \$850k per truck compared to CFS appliances at around \$200k per truck)
- 3 x heavy bulk water tankers
- 3 x medium water tankers
- 4 x quick response vehicles
- 53 x incident management personnel (around 50% of the IMT membership is currently provided by FSA personnel)
- 1 x Forestry SA fire spotting aircraft
- heavy machinery (graders, 4 x dozers etc)
- 126 fire fighting personnel
- 7 x fire spotting towers

The fire towers and fire spotting aircraft have been integral to early fire detection which has meant containment of those fires to very small areas with considerably less impact than would have otherwise occurred.

#### **Operational Performance Of The SACFS and Forestry SA**

The relationship between the SACFS & Forestry SA has been developed over the past 40 years. Anecdotal evidence of efficient fire management and a proven track record of fire detection and containment reinforces the efficient and cooperative nature of personnel in both organizations. There is mutual respect between SACFS members and FSA personnel in terms of the intimate knowledge of firefighting and literally 1000s of combined years experience that senior members of both organizations

hold. This synergy of fire organizations has been the foundation of successful rural fire fighting in the Lower South East.

FSA has specifically developed its equipment and personnel resources to meet the needs of plantation fire fighting. SACFS, whilst also trained in plantation fire fighting does not hold the same experience or intimate knowledge of the forestry areas that FSA personnel hold.

A corner stone of fire fighting in the response area is the fast initial attack strategy. This strategy brings FSA resources and CFS ground/air resources to the fore in the shortest possible time in order to contain a fire before the demands for additional resources rapidly escalate, and before it impacts on the community. FSA maintains paid personnel on their respective forest bases for automatic dispatch in these situations, and provides a crucial component of the initial response strategy. In comparison the SACFS response is a little slower as volunteers need to respond to their respective stations first before travelling to the fire.

Through extensive research and a commitment to technology upgrades, FSA is equipped with the latest in appliances for plantation fire fighting. These appliances, called "Fire Kings", are capable of accessing varying rugged terrain and conditions with ease and provide outstanding crew protection for fighting plantation fires that produce very high levels of radiant heat. By being able to safely access the heart of the fire itself and fight the fire, FSA offer a resource that is not matched by SACFS but which is crucial to fire containment.

In respect of aerial firefighting, the forest owners of the South East initially funded the provision of fixed wing firebombing aircraft. Following the FSA Nursery Fire at Glencoe in February 1998, the SACFS moved to establish the roles of air observer (providing intelligence from the air on fire behaviour and potential asset threat), air attack supervisor (providing aerial resource coordination and air-ground strategy development) and aircraft filling crews (to fill the bombers at designated air bases within the region). With the advent of the National Aerial Fire Fighting Centre (NAFC) the responsibility for the funding of aerial firefighting attack aircraft shifted from the Forest Owners to NAFC and as a result now falls under the control of SACFS. The SACFS continues to supply aircrew to perform both the air observer and air attack supervisor roles as well as filling crews at the nominated bases. These personnel work seamlessly with FSA personnel in order to best utilise the firebombing aircraft in conjunction with the ground based fire fighting resources. The SACFS has established operational filling bases at Mt. Gambier, Millicent, Coonawarra, Naracoorte & Robe in the area of response.

Where larger fires occur, the Incident Management Team setup to manage the fire consists of both SACFS and FSA personnel. Again, this brings together incredible knowledge of fire fighting and strategies in order to contain the fire in the shortest possible time, minimizing life and asset risk. It must also be noted that private forest owners do not provide comparable input into to that of FSA, in terms of Incident Management Team membership.

FSA also has the benefit of a paid workforce and therefore is more easily able to provide personnel to fight fires, conduct hazard reduction and mop up after fires, which at times may take days to complete.

It is our opinion that the unique and well maintained assets of both FSA and the SACFS provide a protection service in plantation areas that is second to none in Australia. This has developed directly as a result of the strong personal relationships between the respective agency personnel and the drive FSA has had to ensure outstanding fire protection services for its assets. In addition, SACFS does not have the budget to provide this level of resourcing for plantation fire fighting and is reliant on the goodwill of SACFS volunteers to provide their services to the community. FSA provides a very necessary and proven set of resources and experience to supplement SACFS resources and experience in order to keep the South East community and its assets safe.

### **Potential Performance Arrangements Should The Forward Sell Occur**

The CFSVA has serious concerns with respect to the potential fire fighting arrangements that may ensue should the SA Government continue with its intent to forward sell forest harvesting rights. These concerns were in no way addressed by the ACIL Tasman report and were exacerbated by inaccurate statements attributed to the Treasurer in respect to current and future fire fighting arrangements.

It is clear to the CFSVA that the consultants from ACIL Tasman did not fully explore the potential impact of a forward sell and grossly understated the importance of FSA resources in terms of their contribution to fire fighting activities in the South East. Indeed, only a few paragraphs in the 121 page report even alluded to the need for efficient and safe fire protection of the forest asset. Additionally, ACIL Tasman did not consult with the CFS and more particularly the volunteers of Region 5 prior to producing the report.

#### **Issue 1: Lack of clarity as to responsibility for both management of forests and the fire protection role.**

We understand that the Governments plan is to lease land currently being managed by FSA to a private company that would also own the rights to the harvest. As a result of this lease there is a lack of clarity as to responsibility for both management of forests and the fire protection role. The Government has stated that *“the purchaser will fund the specific fire management costs that would be borne by a private plantation estate”*, which we may assume as per the FES Act and as per current private forest owner commitment, could mean only a fire truck and some crew.

Under the FES Act there is no specific requirement for equipment and personnel as part of a level of preparedness to be provided by forest owners. There is no compulsion on behalf of the new owners to offer anywhere near the same level of protection as that currently provided by FSA.

FSA is a “Fire Organisation” meaning that it doesn’t just provide a fire truck but fire detection services, incident management team members, fit for purpose “high survivability” equipment, earthmoving equipment & experienced personnel. Additionally, under the accreditation (Australian Forestry Standard ISO 4708 & Environmental ISO 14001) attained by FSA, they also contribute to the fire management process by managing their land in a way that inhibits fire travel (fire breaks, ways in which they plant forests etc).

ACIL Tasman and the Government has stated that provision of fire protection above and beyond that defined within the FES Act will be funded by Community Service Obligation (CSO). At present we understand FSA receive around \$ 350k under CSO. This roughly represents about 10% of the current spend on fire management and protection services. These figures can be verified by FSA.

The “control” of fires is also unclear. At present, FSA is legislated as having responsibility for fire management on FSA land. As a result of current arrangements, FSA land has FSA plantation on it. Should the Government lease this land out it is unclear where or if FSA is responsible for either land management or fire protection services. If FSA is not, by default SACFS will be. This will be a massive impost on SACFS volunteers and cost impact on SACFS in terms of fire fighting and the extended mop-up required post fire.

### **Recommendation 1**

**That clarity around who is responsible for fire protection and response on leased lands is given.**

### **Recommendation 2**

**That minimum standards for firefighting capacity are stated in the FES Act, to apply to all private plantation owners, with a realistic determination of what is necessary to combat large plantation fires. This standard should be at the level currently provided by FSA.**

### Issue 2 : Lack Of consultation with SACFS and CFS Volunteers in relation to fire protection

With reference to the ACIL Tasman report, they state under Environmental Impacts (page vi of the Executive Summary) that : *“ForestrySA has the largest fire fighting capacity in the region, which is well above that provided by other forest growers, including significant contributions to the region’s aerial detection efforts. It is not clear to us that the additional capacity is warranted”.*

The CFSVA agrees that the FSA resources are well and above what other forest owners provide and that the FSA Fire Spotting Towers and FSA Fire Spotter aircraft are an exceptional resource for fire detection. Given ACIL Tasman’s ineffective consultation process, it is no wonder that it is not clear whether the additional capacity is warranted. Senior CFS volunteers consider the current level of FSA resourcing to be appropriate, and the resourcing currently provided by some private plantations owners to be inadequate. Indeed, if the SA Government were to reduce the level of protection currently provided by FSA, it would impact on the SACFS in the following ways –

- Increased pressure on volunteers to provide fire coverage within the plantations by:
  - decreasing the total available resources;

- increasing the time needed to be spent on the fireground to conduct both fire fighting and mop up operations following fire containment. Mop up operations can continue for days for FSA personnel. CFS Volunteers have their employers and businesses to consider, and cannot spend many days making the fireground safe for what is a private industry. It should also be noted that FSA have access to small and heavy earthmoving equipment to facilitate easier mop up, which SACFS crews would not be able to provide;
  - a high reliance on knowledge of forest areas. FSA crews know their forest plantations intimately and can easily navigate to defined locations. CFS crews could do the same but would be unaware of local terrain conditions and therefore may be inhibited or delayed in getting to fires in a timely and safe manner; *and*
  - an increased responsibility to manage fire on private land. FSA currently has legislated control over fires on its land (Fire & Emergency Services Act, Part 4 SA CFS, Sect 8 & 9). SACFS currently has legislated control of fire on private plantations. The potential for SACFS to also be responsible for all aspects of fire management on what is currently FSA land would place considerable additional pressure on the SACFS without a corresponding increase in appropriate resources;
- Higher safety risk in responding to plantation fires where crew protection is less than that provided by Fire Kings;
  - Longer response times due to volunteers needing to respond to their respective stations prior to responding to the tasking. This compares to immediate dispatch of FSA standby crews from their respective Forest bases on days of high fire danger. This delay could adversely impact on the effectiveness of the initial attack strategy.

In comparing current FSA resource levels to those of private forest owners in South Australia and Victoria, and assuming that there would be no additional legislative requirement placed on private forest owners to provide both equipment and personnel than currently exists, fire fighting operations in the region would be seriously compromised. It is not uncommon for a private forest owner to maintain one fire truck and only a small number of crew compared to perhaps two fire kings, a bulk water tanker and up to 8 fire fighting crew for FSA. This exposure would be further exacerbated under conditions where multiple fires occur simultaneously as in dry lightning strike events.

As an example of resource requirements we refer to the “Bluff” Fire situated between Millicent and Mt.Gambier on the 1<sup>st</sup> December 2006. The Bluff fire was 125ha and started in un-thinned pine plantation and was reported as a multi-million dollar fire. This fire occurred on a relatively low fire danger day with an FDI of around 23 (in comparison, a fire ban day is FDI of 50). It involved the following resources :

- SACFS –
  - 350 x personnel
  - 48 x appliances
- FSA –
  - 8 x Fire Kings
  - 6 x bulk water tankers
  - 2 x John Deeres
  - 45 personnel

From an aerial perspective the actions of the initial FSA fire crews and the Fire Kings contributed significantly to the ability to control the fire along with the synergistic effects of CFS and FSA working together. Total time commitment for this fire including mop-up was around 5 days. At one stage consideration was given to evacuation of community members between the fire location and Mt.Gambier due to the fire intensity and direction of travel. This example underpins our opinion that the current level of resourcing for FSA fire fighting is necessary and any reduction could be expected to compromise the safety of the communities in the South East during periods of extreme fire danger.

Another consideration is that of liability in the event of a fire impacting on life or property where it can be proven it is a result of the reduction of levels of protection.

The CFSVA considers that the current level of fire protection provided by FSA needs to be maintained and that it will need to include those experienced FSA fire fighters in order to ensure effectiveness.

### **Recommendation 3**

**That Government consult with CFS and CFS Volunteers to help determine minimum standards as per recommendation 2 and to ensure minimal impact on SACFS volunteers.**

### Issue 3 : ACIL Tasman Suggestion To Contract Local Brigades For Fire Protection

Within the Executive Summary in the ACIL Tasman report it states : *“If the SA Government deemed that the additional fire protection resources currently provided by ForestrySA are warranted, it could continue to contract these services directly with ForestrySA or local fire brigades”.*

To state that these services could be "contracted" to local fire brigades shows little understanding of the volunteer firefighting capacity in South Australia. ACIL Tasman did not consult with SACFS and CFS Volunteers while developing its report. It is worth reiterating that volunteer time is not unlimited and that every hour spent on the fire ground means a financial cost to the self employed volunteer or the employers of volunteers.

Additionally, it is not clear how long FSA would provide the fire protection given that it has been indicated by the Treasurer that FSA management role would last only 5-10 years. The question therefore needs to be asked as to what the SACFS volunteers would be expected to do post the completion of the FSA management term.

#### **Recommendation 4**

**That the Government communicates to the new owners and other private plantation owners the limitation in capacity of CFS Volunteer brigades to protect plantation assets, and that owners must recognize their responsibilities for prevention and response.**

#### Issue 4 : Impact Of Uncertainty & Economic Conditions On SACFS Membership

A high degree of uncertainty exists within the timber industry at present. This is largely a result of the announcement of SA Government in respect of its intent to forward sell. Consequently the “timber towns” of Nangwarry and Tarpeena have seen considerable impact with mill closures & loss of employment opportunity. This has meant people are leaving the area and where they are also CFS members, the Service is obviously losing members. When we consider the need for fire response in these areas it is obvious that the capability would be diminished. This reduction in response capability would be compounded by any reduction in FSA fire fighting resources. Subsequently even more pressure would be placed on volunteers from other brigades to respond to the fires.

This has the flow on effect of decreasing the capacity of South East Volunteers to respond to other emergencies in their region such as road crashes and structure fires.

#### **Recommendation 5**

**That the Government undertake a study as to why volunteer numbers are declining in the South East, and provide funding to deliver an effective recruitment drive for new Volunteers**

#### Issue 5 : Impact Of A Reduction In Fire Prevention Activities Currently Provided By ForestrySA

Forestry SA currently conducts considerable hazard reduction activities within its plantation area. This hazard reduction markedly reduces the potential of fire to rapidly spread within and between plantation areas and potentially from FSA land onto private land. This hazard reduction process is impeccably managed by very experienced FSA personnel. Comparative examples for private forest owners show at times less than adequate hazard reduction. As with FSA fire protection resources, FSA have chosen world's best practice in terms of the standards they maintain. This hazard reduction directly assists SACFS firefighting efforts and needs to be maintained into the future.

#### **Recommendation 6**

**That Government retains the FSA fire protection resources to the standard currently in place, not just for the 5 -10 year period, but ongoing for the life of the lease. Further to that, that the current hazard reduction practices currently in place be retained as a minimum.**

## **Recommendation 7**

**That fire prevention activities on private forest plantations be audited to ensure adequate hazard reduction.**

### **Summary**

The CFSVA considers that the potential impact on SACFS volunteers is too great to be ignored should the SA Government continue with its intent to forward sell forest harvesting rights. There has been no clarity provided by the Government or ACIL Tasman in respect of the arrangements for future fire protection of the forest plantation asset. Neither the standard of protection nor who will provide them is defined. The Fire and Emergency Services Act does not set out minimum standards, and that which is provided currently by some private plantation owners is deemed to be inadequate by senior CFS volunteers.

A reduction in the fire prevention and response capacity on plantations has the potential to cause significant loss of life and property in the communities surrounding the forests. Adequate hazard reduction and early detection and response have been crucial in stopping the spread of fires to other properties and townships.

The ACIL Tasman Report stated "*It is not clear to us that the additional (fire protection) capacity is warranted*". What is clear is that they made little or no attempt to gain that understanding.

If the sale of the harvesting rights goes ahead without that clarity, and without provision of the resources currently provided by FSA, there will be a directly impact on the safety of volunteers and their capacity to protect life and property in the South East region.

## **Summary of Recommendations**

### Recommendation 1

That clarity around who is responsible for fire protection and response on leased lands is given

### Recommendation 2

That minimum standards for firefighting capacity are stated in the FES Act, to apply to all private plantation owners, with a realistic determination of what is necessary to combat large plantation fires. This standard should be at the level currently provided by FSA

### Recommendation 3

That Government consults with CFS and CFS Volunteers to help determine minimum standards as per recommendation 2 and to ensure minimal impact on SACFS volunteers.

### Recommendation 4

That the Government communicates to the new owners and other private plantation owners the limitation in capacity of CFS Volunteer brigades to protect plantation assets, and that owners must recognize their responsibilities for prevention and response.

### Recommendation 5

That the Government conducts a study as why volunteer numbers are declining in the South East, and provide funding to deliver an effective recruitment drive for new Volunteers

### Recommendation 6

That Government retains the FSA fire protection resources currently in place, not just for the 5 -10 year period, but ongoing for the life of the lease. Further to that, that the current hazard reduction practices currently in place be retained as a minimum.

### Recommendation 7

That fire prevention activities on private forest plantations be audited to ensure adequate hazard reduction

