



Ryde - Hunter's Hill Flora and Fauna Preservation Society

Member of Nature Conservation Council of N.S.W.

NSW Independent Bushfire Inquiry
GPO Box 5341
Sydney NSW 2001

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Dear Sir,

Re: NSW Bushfire Inquiry

I am writing on behalf of the Ryde Hunters Hill Flora & Fauna Preservation Society. We are an incorporated local conservation group established over 50 years ago. Under our constitution the aims and objects of RHHFFPS include:

- The education of our members and the community, particularly in the local area, in nature conservation and protection of the environment;
- promotion of ecologically sustainable land use and development;
- promotion of nature conservation including an adequate system of national parks, wilderness areas, nature reserves, wildlife refuges and corridors and urban bushland reserves;
- protection measures for native wildlife; and
- working for the permanent retention and conservation of all natural areas in the local district and increase in the areas set aside for nature conservation.

I would like to comment on the Terms of Reference Point 2 (current laws) and Point 5 (Preparation and planning for future bushfire threats and risks) in respect of the RFS 10/50 Clearing Code.

Current laws

The ongoing loss of trees in RFS 10/50 Clearing Code entitlement areas in many instances appears to have little to do with bushfire risk or hazard reduction.

Vegetation should be assessed by experts from or accredited by the RFS to determine the bush fire risk, rather than having the responsibility assigned to landowners. Self-assessment is too complex for landowners to determine whether clearance is legal and whether valuable environmental assets are being unknowingly removed.

I note that the practice of removing all trees within 10 metres and all vegetation within 50 metres of a habitable dwelling (10/50) is inconsistent with many recommendations of the recently gazetted Planning for Bushfire Protection 2018. For example Planning for Bushfire Protection 2018 recommends clearing on the hazard side of a dwelling whereas 10/50 permits it on all four sides of a dwelling.

The NSW RFS has a streamlined environmental approval process in place that enables assessment of bush fire hazard reduction activities. The Bush Fire Environmental Assessment Code already provides for hazard management appropriate to individual sites and identifies vegetation management that does not need to involve removal of all vegetation.

We consider that homeowners need to notify the RFS and relevant councils of vegetation clearance proposed so that local fire managers have an up-to-date understanding of the clearance being undertaken. Monitoring vegetation clearance carried out under the 10/50 Code is not possible without a comprehensive reporting process.

Preparation and planning for future bushfire threats and risks

In our view property owners have confidence in RFS advice and the RFS must regain its role in providing onsite advice and approval for hazard reduction activities. People should be encouraged to ask for assistance from existing qualified officers to help assess environmental and bush fire management matters and not rely on poorly informed self-assessment.

Conclusion

The 10/50 Code has caused significant unintended consequences including impacts from reduced tree canopy cover. Opportunities to reduce bushfire hazards that are legal and lawful are welcome. Unfortunately, there is ongoing removal of healthy trees under the 10/50 scheme for reasons that often have little to do with bushfire hazard protection.

Reversing the decline in tree canopy is a key objective of the Greater Sydney Commission. We urge that you recommend a change to the RFS 10/50 Clearing Code to prevent further unnecessary reduction of tree canopy.

The 5 year Statutory Review has not occurred so we cannot assess the full impact of this Code, but it is clear that it has been exploited, whether intentionally or not, with deleterious consequences for ecological values and habitat corridors in our local environment and neighbourhoods.

Francis Breen
President



22 May 2020