



STEP Inc

Community-based Environmental Conservation since 1978

21 May 2020

NSW Independent Bushfire Inquiry,
GPO Box 5341,
Sydney NSW 2001

inquiries@bushfireinquiry.nsw.gov.au

Dear Inquirers

STEP Inc is a local community-based environmental group, with a membership of over 400 in the northern Sydney area. Our main objective is to preserve natural bushland in northern Sydney from alienation or degradation and ensuring proper management of this bushland. Our group has considerable experience in environmental issues and regenerating and preserving natural bushland and native vegetation.

This is an additional submission supplementing our previous submission dated 20 April 2020. We wish to focus on the effectiveness of the current RFS 10/50 clearing code as a current law and practice (Terms of Reference, Point 2) and the desirable improvements in this code in planning for future bushfires in urban areas (Point 5).

Point 2 - Current Laws

The RFS 10/50 Clearing Code has several problems. It was supposed to be reviewed after 5 years of operation but now, after 6 years, it remains unchanged.

From the perspective of its suitability for reducing bushfire risk the code has several issues:

- It gives landowners a false sense of security. The emphasis on building design and maintenance that is important for reducing risks from radiant heat and ember attack is lost.
- The 10/50 code uses a mapping system that is too broadly defined so that residents in areas that have low bushfire risk can remove trees for reasons other than bushfire risk, for example to improve views in areas near Sydney Harbour or because trees are dropping leaves.
- Clearing is allowed on all sides of a property even though the fire risk maybe low on the side of buildings away from the bushland.
- Landowners are expected to be able to identify threatened species so that they will not be cleared. This is impractical.
- There is no mechanism for assessing the amount of clearing that is occurring so that the process of risk management or excessive clearing cannot be monitored.
- Urban areas are losing tree canopy cover that is vital for wildlife habitat and connectivity and reduction in the Heat Island Effect but has no benefit in reducing bushfire risk.

Fundamentally the problem with the current code is the use of self-assessment.

Point 5 – Planning for future fire risks

Continuing scientific research into bushfire behaviour taking into account types of vegetation, topography and a expected range of weather conditions, including climate change, should form the basis of guidelines for vegetation management.

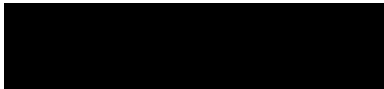
Vegetation should be assessed by experts from or accredited by the RFS to determine the bushfire risk, rather than having the responsibility assigned to landowners. Self-assessment is still too complex for landowners to determine whether clearance is legal and whether valuable environmental assets are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

Native vegetation should not be cleared without a well-informed assessment, particularly if it is in a low bushfire risk area. Some types of vegetation can provide protection from lower intensity bushfires while not increasing the risks from a high intensity fire.

The environment should be a key consideration in managing bushfires. Many homeowners are unlikely to know what threatened species, habitat values and other environmental matters should be considered during clearing assessment.

The construction of new houses near bushland must be carefully planned so that valuable vegetation is not automatically removed. The house design and maintenance should be the major part of the bushfire risk reduction rather than clearance of all the vegetation. New houses and public facilities should not be built in high risk areas.

Yours faithfully,

A black rectangular box redacting the signature of Jill Green.

Jill Green
President