

Your details

Mr

Title

First name

Peter

Last name

Comensoli

Submission details

I am making this submission as

A primary producer

Submission type

I am making a personal submission

Consent to make submission public

I give my consent for this submission to be made public

Share your experience or tell your story

Your story

In 1928 my grandparents bought the property that I currently farm commercially at the above address. At that time, Indigenous neighbours taught my grandparents a mosaic pattern of cool-season burning to eliminate the risk of wild fire. To the best of my knowledge, that practice was consistent with indigenous settlement of this country that dates at least thirty thousand years based on the local archaeological record. On several occasions, since hazard reduction burning has required authorisation (1994 legislation); I have applied for and obtained a hazard reduction certificate from RFS and conducted my own mosaic burning of the bushland on our property, consistent with practices handed down from my grandparents.

In May 2019 I made an application for a hazard reduction burn and was denied for the first time. It was revealed that insufficient time had elapsed since the previous burn. Specifically, the hazard reduction guidelines disallow burning of dry sclerophyll

forest at intervals of less than 10 years. The previous burn had been in 2015. On that occasion I reported 100% success of the burn but I did not burn the total area that was authorised so as to remain consistent with the staggered mosaic pattern that my family has used to control accumulating fuel loads for generations. Interestingly, the burn before this was in 2013 yet I obtained hazard reduction certificates for both the 2013 and 2015 burns without the necessary 10 year gap.

I have recently re-applied for a modified version of the same burn. This application provided greater specificity of the area to be burned. However, today (21.05.2020) I was advised verbally that the same criteria will be applied to this application and the authorising officer was not optimistic about my chances of success. Nothing has changed despite a summer of tragedy!

The effect of these rejected applications is to:

1. reject established practice (that has previously been endorsed through hazard reduction certificates issued by the RFS) in favour of a generalist, 10 year moratorium that takes no regard to past practice, emergent fuel load, risk to assets, local flora and fauna diversity and seasonal conditions eg prolonged drought.
2. place at risk our farming assets that are adjacent to the bushland in question as well as our neighbours whose properties would be impacted by fire emanating from, or travelling through, our bushland.
3. create a circumstance that increases the risk of wild fire occurring in the summer months causing relatively catastrophic damage to the flora and fauna that the 10 year policy is designed, supposedly, to protect.
4. place at greater risk the lives of myself and my family who live on this property, our workers and firefighters who would be forced to confront a wildfire of greater intensity than would have occurred if fuel loads had been reduced routinely by a continuing program of mosaic burns.
5. disregard arguably thirty thousand years of established practice. This progressive custody of the immediate landscape has had the effect of creating resilience and bio-diversity amongst the established species of flora and fauna making them both tolerant to, and reliant upon, a pattern of mosaic burning.

Therefore, I recommend that the Inquiry finds that landholders with an established practice of cool season mosaic burning of bushland on their properties be allowed to continue that practice for the purposes of reducing bushfire hazard and consistent treatment of the landscape.

I believe that the past fire season was far more ferocious and widespread because practices of the kind that I have used in the past have slowly, but surely, been either disallowed or discouraged Statewide. The past season has proven that RFS resources cannot confront widespread risk to farming assets without the assistance of responsible hazard reduction. The current directive to landholders to evacuate their property presupposes that they can do so safely on public roads and that somebody else without knowledge of the property can protect the farmer's livelihood. This is naive and pretentious but, more particularly, it is dangerous for people in rural areas, including firefighters.

During this season's fires, which came close to our property, I had the experience of also being a member of the Mangrove Mountain RFS brigade. A number of observations are noteworthy:

1. Central Coast Council had not maintained ANY of the existing fire trails under its control, meaning that fire breached these trails or hasty and rough bulldozer trails were made in their place.
2. Despite laudable intent, the local brigade had conducted the

most minimal of hazard reduction burning relative to the scale of its district over the last decade. The main reasons appeared to be the kind of frustration to obtain approvals that I have mentioned above, as well as the difficulty in mustering volunteer crews to coincide with favourable weather conditions.

3. Local command was very slow to emerge as fire moved towards this district. There was confusion about the role and authorisation of back burning.

4. Back burned lines were poorly patrolled resulting, on one occasion, in a fire that had been a necessary back burn being left unattended prematurely and breaching the fire trail on the western side of Mangrove Creek and jumping into Waratah Road and Macpherson State Forest.

The experience of these observations and others added from a lifetime in this district leads me to conclude that hazard reduction cannot be conducted successfully by the volunteer RFS on public lands and on private land where the occupant is incapable of doing it themselves. Too often, the best of intentions to conduct hazard reduction on public or private lands are obstructed by the availability of volunteers, authorisation, good weather and resources. Any one of these factors can delay a burn repeatedly until either it is not done at all or the cascading demand to do more and more burns makes the job impossible. Further, the RFS in-concept exists to fight wild fire. Volunteers obtain special capacity to be absent from their employment in order to give priority to fire fighting. RFS administration and technology is oriented to wild fire control.

The inadequacy of the RFS in conducting and authorising hazard reduction does not excuse the lack of this important fire mitigation tool. Therefore, I recommend that a new agency (capable of drawing on but not relying upon the RFS) be established with full-time professional resources and personnel for the sole purpose of planning, authorising and conducting a pattern of hazard reduction burning adjacent to populated areas across the state. The agency should be constructed such that each local government area retains sufficient capability for meaningful hazard reduction within its boundaries. Such an agency would take on responsibility for maintenance of fire trails as well.

Terms of Reference (optional)

The Inquiry welcomes submissions that address the particular matters identified in its [Terms of Reference](#).

1.1 Causes and contributing factors

Derelict fire trails.
Lack of hazard reduction burning adjacent to, and within, the farming and built landscape.
A general disregard of hazard reduction as an important component to mitigate the risk of wildfire.
A pretense that RFS resources can fight bush fire that has been proven to be false in 2019/2020.

1.2 Preparation and planning

There was none locally.

1.3 Response to bushfires

An over-reliance on centralised control from RFS headquarters with little regard to local observation and experience.

1.4 Any other matters

Farming assets, particularly established orchards and infrastructure, are as important to commercial farmers as their home. Any fire planning that concentrates on houses at the

expense of, or in preference to, farm assets renders the farmer vulnerable to a multi-year loss of income earning capacity. Asset protection zones and hazard reduction policies need to take into account the extensive risk posed to commercial farming assets and capacity from unchecked wildfire.

Supporting documents or images
