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**Submission Number: NND.001.01064**

**Submission Of: Keith Lamb**

### Your Details

Email address:

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Preferred means of contact: Phone

What is your submission based on? I am making this submission based on my professional knowledge, qualifications or experience or on behalf of a group or organisation

What is your area of professional expertise? Timber Company

If you are lodging your submission on behalf of a group or organisation, what is the name of the group or organisation? Kangaroo Island Plantation Timbers

### Your Submission

In your experience, what areas of the bushfire emergency response worked well?

In your experience, what areas of the bushfire emergency response didn't work well?

In your experience, what needs to change to improve arrangements for preparation, mitigation, response and recovery coordination for national natural disaster arrangements in Australia?

Is there anything else you would like to tell the Royal Commission?

Do you agree to your submission being published? Yes I agree to my submission being published in my name

Supporting material provided:

KIPT Submission to Royal Commission 28 April 2020.pdf



28 April 2020

Royal Commission into Natural Disaster Arrangements,  
Locked Bag 2000, Manuka, ACT 2603

rcnda.enquiries@royalcommission.gov.au

Air Chief Marshal Mark Binskin (Retd)  
Honourable Dr Annabelle Bennett AC SC  
Professor Andrew Macintosh

### **Submission to the Royal Commission into National Disaster Arrangements**

Kangaroo Island Plantation Timbers Limited (KIPT) welcomes the opportunity to make a submission to the 2019/2020 Bushfire Royal Commission.

We focus on the Duncan and Ravine complex fires on Kangaroo Island, which occurred between 20 December 2019 and 21 January 2020, but our comments may apply to fire management more generally.

#### ***KIPT Standing***

KIPT is a publicly listed forestry company, registered in South Australia, which owns and operates 14,369 hectares of timber plantations on Kangaroo Island, on a land base of approximately 25,000 ha (including 7,000 ha of native vegetation). Kangaroo Island also has an additional 3,256 ha of plantations, owned by 12 independent grower/investors, who are not formally represented in this submission.

Before the 2019-20 fires, plans to start harvesting the plantations were well advanced, pending government approval for KIPT to build a Seaport at Smith Bay on the north coast of Kangaroo Island. As a result of the fires, 95% of the KIPT plantations, and all the plantations owned by private growers, have been adversely affected.

The total area of KIPT and privately-owned plantations represent about 8% of the 211,000 ha affected by fire on Kangaroo Island. The remaining area comprises family farms, dwellings and tourism infrastructure, and an extensive area native vegetation on private land, crown land and national park. While the 2019-20 fire season was devastating for many communities and individuals across Australia, the impact is probably greater for a small island community like Kangaroo Island, with limited resources and transport constraints which create logistical challenges to fire response and recovery.

KIPT staff and contract fire fighters participated in the fire-fighting campaign between 20 December 2019 and 21 January 2020. As Managing Director of KIPT, I was present during most of the period, and on the fire-line at West End Highway on 3 January with the KIPT team (11 in total), when the fire escaped from Flinders Chase National Park under Catastrophic Fire Danger conditions and burned more than 100,000 ha in several hours.

As a large land manager on Kangaroo Island, KIPT had in the preceding years taken its fire management responsibility seriously, adopting industry standards for plantation maintenance, securing off-island resources and expertise to supplement its local capacity, actively engaging with CFS as an industry brigade, and coordinating with DEW in planning for native vegetation management.

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As a professional forester, I bring to this submission more than 30 years' experience in wildfire suppression and management, in both a professional and volunteer capacity. KIPT commissioned an independent forensic analysis of the fire events between 20 December 2019 and 21 January 2020 by consultants well known in the Australian forest industry and SA fire-fighting sector. This submission draws from first-hand experience of the events of the fire, prior professional knowledge and experience, and the independent forensic analysis.

### ***Impact on our business***

Before the fires, KIPT shareholders owned and operated a high-value timberland asset which was soon to be brought into production. KIPT took the precaution to insure the timber crop against fire and is now well placed to continue operating under the changed conditions.

The fires have impaired the value of the current crop of wood products, and capacity of the forests to continue to grow. Nevertheless, salvage of the wood products is still possible if the trees are not subject to further fire damage and harvested in a timely manner. Left unharvested, the fire-affected trees will deteriorate to the point that they are incapable of salvage.

KIPT, along with several mainland companies and government agencies affected by the 2019-20 fire season, is preparing a strategy to recover the fire-affected wood. Unlike our mainland colleagues, KIPT is prevented from sending its product to market until the proposed Seaport at Smith Bay is constructed. This creates additional risk to the KIPT shareholders and independent growers, not shared by the rest of the sector.

The salvage task can only proceed once a port is constructed, and land may only be brought back into full production once the fire-affected trees are removed. In making its investment decisions for the future, KIPT - like its neighbours and the wider community on Kangaroo Island - does not want to see the events of the 2019-20 fire season repeated.

### ***Our submission***

KIPT has addressed the terms of reference for the review in Appendix A and a synopsis of the fire events for the period 20 Dec-21 Jan is provided below. In addition, I take the opportunity to reinforce the submission with a statement addressing several recurring themes that have emerged in the public domain, since the fires started on 20<sup>th</sup> December:

- Timber plantations represent a capital-intensive high-value form of agriculture, because many years of biological growth is accumulated in the forest until the trees reach maturity. Plantation health and the products produced from the trees are sensitive to fire. Owners and managers of timber plantations are motivated to establish risk management strategies including in-house fire-fighting capacity and engagement with neighbours and government agencies on fire surveillance and suppression. It is common for plantation companies to hold some form of insurance against wildfire.
- The science of fire behaviour and the principles of fire management and suppression are well understood. There should be no doubt that the fires on Kangaroo Island before the conflagration on 3 January were containable. A strategy which emphasised suppression through direct attack between 20 December and 2 January, would have likely mitigated or avoided the damages incurred on 3 January. Climate change may exacerbate fire risk, reinforcing the need to modify native vegetation management policies and emphasise direct attack strategies to avoid a repeat of the 2019-20 Kangaroo Island fires.

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- Fire behaviour in native vegetation reflects accumulated fuel load and can be mitigated through cool burning for hazard reduction and ecological purposes. Unmanaged native vegetation allows fuels to accumulate and presents a high risk for fire occurrence, and increased difficulty of suppression. Management of native vegetation in proximity to human habitation and enterprises should prioritise community protection, through regular cool burning and direct-attack methodologies.
- Well-managed timber plantations do not present a higher risk of fire compared to other rural land activities. Plantations present a lower risk than unmanaged native vegetation due to the plantation structure and fuel arrangement, and design features such as compartmentalisation with mineral earth fire breaks, and water access points. Direct fire attack in plantations is well accepted to be safe and achievable due to the localised climate effects of the trees and the arrangements of fuel. Back-burning should not be undertaken in plantations unless absolutely necessary.
- Direct attack should be the primary tactic for fire suppression in native vegetation, plantations and farmland. In our view, there is a tendency in recent years for fire-fighting agencies towards risk averse strategies aimed at containment and fallback. This has increased risk of wildfires burning longer and larger during cooler periods in which suppression could have been achieved through direct attack. Larger fire fronts create the conditions in which high-intensity conflagration can occur on Catastrophic Fire Danger days, such as experienced 3 January 2020 on Kangaroo Island. Wildfire burning under Catastrophic conditions cannot be stopped and will consume all flammable materials until a weather change or some geographic obstacle allows for containment.
- Existing powers are already held by local government in South Australia to manage fire risk through establishment of policies and procedures for rural lands. Country Fire Service has the authority to mobilise resources to attack and contain wildfire. In our view, improvements to the application of existing powers should be considered before new powers or laws proposed.

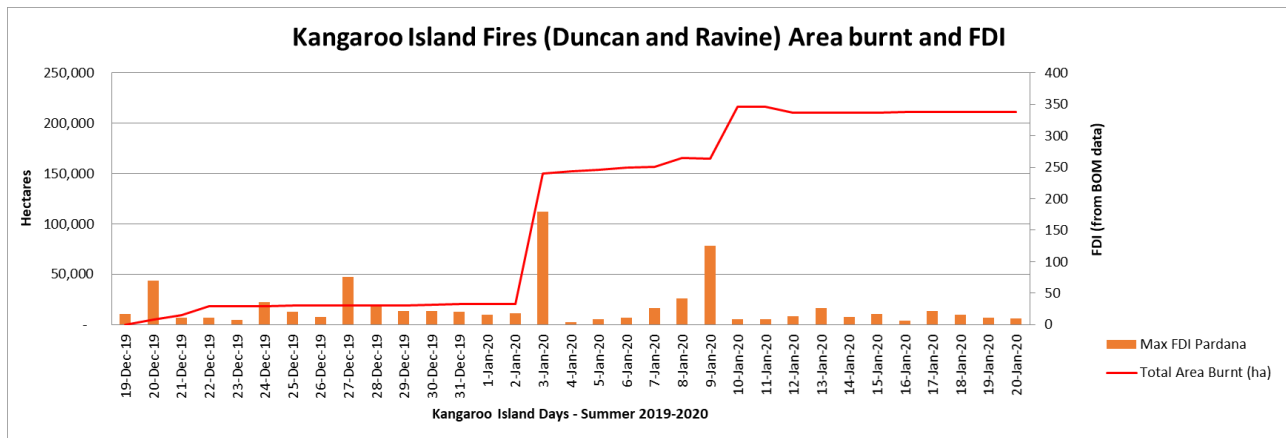
This submission is made on the basis that the Federal and State governments, together with the wider community, will support wise and well-reasoned approaches to landscape management and wildfire suppression. The objective should be to reduce the risk as much as possible of uncontrolled wildfires occurring under Catastrophic Fire Danger conditions, as occurred on the 3rd and 9th of January 2020, which in our view could have been largely avoided.



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		Situation	Response
1	20 – 29 December Duncan Fire	Lightning strikes cause several fires to emerge on private land.	KIPT was on elevated surveillance 16-20 Dec due to high fire danger, and responded with CFS and farm units when lightning ignited fires emerged 20 Dec. Losses from wildfire to community minimised however concern raised about backburning unnecessarily under plantations and outside Incident Action Plans.
2	30 Dec - 2 <sup>nd</sup> Jan Ravine 1 Fire	Lightning strikes cause two new fires in national park. High fuel loads contributed to fire behaviour.	Suppression response was hampered by Wilderness regulations and lack of access to national park.
3		Escape of fire north across Cape Borda Rd into plantation and other land.	Failure to suppress fire in national park, and failure to attack spot-overs on Cape Borda Road leads to avoidable losses for plantation owners and local community. Ravine 1 fire continues to burn while Ravine 2 grows in area.
4	3 January Ravine 2	Escape of fire east across West End Hwy into plantation and other land under Catastrophic Fire Danger Conditions. Pardana is evacuated	Catastrophic FDI due 3 Jan was predicted days in advance. Failure to suppress fire through direct attack in national park prior to 3 January leads to large scale losses to community and plantation owners.
5	9 January Ravine Complex	Ongoing and uncontrolled large fire area burning under Catastrophic Fire Danger Conditions. Pardana and Vivonne Bay are evacuated.	
6	10 Jan-21 Jan	Containment and mop-up period.	Ongoing containment strategy included backburning under plantations, increased area of plantation affected by fire. Incident of arson reported on or near to KIPT estate.



## Appendix A: KIPT's response to relevant parts of the terms of reference

### (a) The responsibilities of, and coordination between, the Commonwealth and State, Territory and local Governments relating to preparedness for, response to, resilience to, and recovery from, natural disasters, and what should be done to improve those arrangements, including with respect to resource sharing;

The roles and responsibilities of Commonwealth and State governments are well established and understood by those who are responsible for fire and emergency response. It is State responsibility to manage land and fire, and in the normal course of events, the Commonwealth has no direct role in fire suppression at a state level.

Nevertheless, large scale emergencies such as seen during the 2019-20 fire season exposed limitations in state level capacity, particularly on Kangaroo Island. When the ADF were deployed to Kangaroo Island to assist in the campaign, we discovered they were severely restricted in areas of operations, and were not available for direct fire suppression work, rather playing a support role.

Our view is that Volunteers provide the backbone for fire suppression in Australia, however they should not be required to sustain long-term campaigns such as the December-January fires on Kangaroo Island. This is not a criticism of Volunteers as much as a recognition that Volunteers have day jobs, are often under-trained or inexperienced, and cannot be reasonably expected to be exposed to the sorts of sustained physical efforts and risks that could be provided by professional fire fighters.

Consideration should be made to improving the efficiency and efficacy of available existing fire-fighting resources. Training and resourcing for local volunteers and state-based professional fire-fighters (national parks and forestry), as well as farm units and private land-owners, should emphasise rapid response and aggressive direct attack with the aim to suppress any wildfire to a minimum area, say 5 ha. The focus on short run direct aggressive attack will reduce the chances of large scale conflagrations such as occurred on the afternoon of 3<sup>rd</sup> January 2020, and long-term fire-fighting campaigns such as experienced on Kangaroo Island 20<sup>th</sup> Dec-21<sup>st</sup> January.

Where immediate suppression has not been possible, the additional support provided by out-of-region state and inter-state resources should maintain that aggressive direct attack philosophy. For fires of significant scale, state-based fire agencies could be supported an appropriately trained and resourced military force. It is important that any military force be capable of direct aggressive attack fire fighting tactics.

While we do not advocate formal payment to Volunteers, the Commonwealth could identify tax-based benefits or credits to volunteers involved in campaign fire fighting campaigns.





**(b) Australia's arrangements for improving resilience and adapting to changing climate conditions, what actions should be taken to mitigate the impacts of natural disasters, and whether accountability for natural disaster risk management, preparedness, resilience and recovery should be enhanced, including through a nationally consistent accountability and reporting framework and national standards;**

We make observations on two key areas considered important for improving resilience to local communities and the Australian ecology: fuel reduction burning and fire insurance.

1. The single most important practical opportunity for improving resilience is to increase commitment to fuel reduction burning in native vegetation during the off-season. Time and again, science and experience shows that an active fuel management regime provides greater resilience to environments and communities that otherwise bear the impact of uncontrollable wildfires.

The Commonwealth government should bring its weight to bear on state and local governments who have developed bureaucratic and philosophical barriers to undertaking effective fuel reduction programs. This could include:

- Setting national and state targets for annual fuel reduction programs
- Public education on the role of fire in Australian ecology, and in fire fighting.

2. The forestry sector is becoming increasingly concerned about the cost and availability of wildfire insurance. We have seen premiums increase in recent years following natural disasters in Australia and overseas. It is common to hear commentary that the frequency and intensity of natural disasters is increasing due to climate change. If as a result of increasing frequency and intensity of wildfires in Australia, the market is unable to provide reasonably priced access to wildfire insurance, the Commonwealth government should consider introducing mechanisms to improve market functioning.

**(c) Whether changes are needed to Australia's legal framework for the involvement of the Commonwealth in responding to national emergencies, including in relation to the following:**

- a. **Thresholds for, and any obstacles to, State or Territory requests for Commonwealth assistance;**
- b. **Whether the Commonwealth Government should have the power to declare a state of national emergency**
- c. **How any such national declaration would interact with State and Territory emergency management frameworks;**
- d. **Whether, in the circumstances of such a national declaration, the Commonwealth Government should have clearer authority to take action (including, but without limitation, through the deployment of the ADF) in the national interest;**

No changes are suggested for changes to Australia's legal framework, although (d) could be considered in light of the suggestion that the ADF be trained and made available for providing fire fighting resources in addition to state-based efforts.



**(d) Any relevant matter reasonably incidental to a matter referred in in the paragraphs (a) to (c).**

We are aware and have contributed to submissions made by the Institute of Foresters of Australia (IFA), and Australian Forest Products Association (AFPA). We support the submissions made by these organisations.