

Submission Number: NND.001.01150

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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?

If you are lodging your submission on behalf of a group or organisation, what is the name of the group or organisation? Humane Society International - Australia

Your Submission

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

See attached submission

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

See attached submission

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

See attached submission

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

See attached submission

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

Supporting material provided:

28-04-20 HSI Submission to Natural Disasters Royal Commission.pdf



HUMANE SOCIETY INTERNATIONAL

Submission to the Royal Commission into Natural Disaster Arrangements

Humane Society International (HSI) is the world's largest conservation and animal welfare organisation with over 10 million supporters globally, including 70,000 locally in Australia. We have more than 25 years of experience in Australia working for the protection of animals and the environment focusing on both wildlife conservation and animal welfare. Relevant to this inquiry, HSI established and runs the [Wildlife Land Trust](#) in Australia which is a national network of over 650 properties that are dedicated to wildlife conservation and care. HSI is also responsible for the scientific nomination of more than 70 threatened species and 30 threatened ecological communities listed on the Commonwealth *Environment Protection and Biodiversity Conservation (EPBC) Act 1999* and equivalent state and territory laws and remain vested in their ongoing conservation. HSI also has an international disaster response team which is highly experienced in animal rescue having been deployed to assist with disaster relief efforts in the wake of multiple cyclones, earthquakes and bushfire disasters around the world.

HSI welcomes the opportunity to submit to the Royal Commission into Natural Disaster Arrangements which was established in response to the extreme 2019/2020 bushfire season in Australia.

We will restrict our comments to terms of reference (f) which relate to our expertise and experience in this bushfire season. During this bushfire season HSI's direct experience with the fires has been deployment of our international disaster response team to undertake wildlife search and rescue on Kangaroo Island, disbursing a Wildlife Emergency Response Fund to drought and bushfire impacted wildlife carers across all fire zones and preparation of scientific nominations to upgrade EPBC Act protection for bushfire impacted threatened species and threatened ecological communities.

Term of Reference f) ways in which Australia could achieve greater national coordination and accountability — through common national standards, rule-making, reporting and data-sharing — with respect to key preparedness and resilience responsibilities, including for the following:

1. *land management, including hazard reduction measures;*
2. *wildlife management and species conservation, including biodiversity, habitat protection and restoration;*

3. *land-use planning, zoning and development approval (including building standards), urban safety, construction of public infrastructure, and the incorporation of natural disaster considerations;*

f) i. Land management, including hazard reduction measures

The severity of the 2019/2020 bushfire season is blamed on a warming climate which is the result of rising carbon and other greenhouse gas emissions. The most fundamental hazard reduction strategy Australia must pursue is one to mitigate climate change.

How we manage land has significant consequences for our carbon emissions. Emissions from land use, largely agriculture, forestry and land clearing, make up some 23% of the world's greenhouse gas emissions¹. The conservation of native vegetation and strict controls on vegetation clearing must be an essential part of Australia's climate mitigation strategy.

The principal limit on hazard reduction burn offs ahead of the 2019/20 bushfire season was a lack of suitable weather conditions. The window of opportunity for safely conducting burn offs was narrowed by higher winter temperatures and drought, themselves symptoms of climate change. This was expressed repeatedly by fire authorities during the 2019/2020 bushfire season. HSI rejects the narrative perpetuated by some in the media and politics that hazard reduction measures were prevented by 'green' policies. Controlled burn off strategies to prevent the build-up of fuel loads with the aim of preventing more extreme bushfires are supported by conservationists. Avoiding more extreme bushfires is beneficial for animal welfare, biodiversity protection and for reducing carbon emissions from burning forests.

How hazard reduction measures are conducted must be in line with the best available scientific and ecological advice. Hazard reduction measures need to avoid deleterious impacts on animal welfare, biodiversity and the value of natural forests for climate mitigation and other essential ecosystem services. Clearance and disturbance of vegetation at scale will have the perverse effect of adding to carbon emissions and reducing carbon sequestration, thereby exacerbating climate change.

Wildlife has suffered immensely during the 2019/2020 bushfire season. Hazard reduction burn-offs ahead of the coming season will need to take great care to avoid exacerbating these impacts in terms of both animal welfare and conservation. HSI notes that the Wildlife and Threatened Species Bushfire Recovery Expert Panel, convened by the Federal Minister for Environment, has identified 119 vertebrate animal

¹ IPCC, 2019: Climate Change and Land: an IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems [P.R. Shukla, J. Skea, E. Calvo Buendia, V. Masson-Delmotte, H.-O. Pörtner, D. C. Roberts, P. Zhai, R. Slade, S. Connors, R. van Diemen, M. Ferrat, E. Haughey, S. Luz, S. Neogi, M. Pathak, J. Petzold, J. Portugal Pereira, P. Vyas, E. Huntley, K. Kissick, M. Belkacemi, J. Malley, (eds.)]. In press.
<https://www.ipcc.ch/srccl/>

species², 191 invertebrate species³ and 471 plant species⁴ that have been impacted by the bushfires and which require urgent management intervention. In a communique issued 11 March 2020, the panel recommended that one of the medium term measures (6 months to 2 years after the fires) will need to be the identification of key unburned refuge sites for these species so that they can be protected from threats including further fire⁵. Controlled burn offs should be conducted in consultation with vertebrate, invertebrate and plant ecologists and threatened species experts. It will also be important to consult with the local wildlife rescue organisations in proposed burn off areas so that immediate wildlife care and welfare needs are considered.

Recommendations:

- Australia must vigorously pursue climate change mitigation strategies to reduce the risk of bushfires continuing to increase in intensity, scale and frequency.
- Strict controls on vegetation clearing are required as part of climate mitigation strategies.
- Controlled burn-offs should be undertaken to prevent the build-up of fuel loads and be conducted according to best available scientific and ecological advice to avoid deleterious impacts on animal welfare, biodiversity, carbon emissions and ecosystem services.
- Hazard reduction burn-offs undertaken ahead of the 2020/2021 bushfire season will need to take great care to avoid further welfare and conservation impacts on wildlife recovering from the 2019/2020 season. Consultation with vertebrate, invertebrate and plant ecologists, threatened species experts and local wildlife care organisations will be essential.

f) ii. Wildlife management and species conservation, including biodiversity, habitat protection and restoration

HSI has so far acted in three main ways to provide direct assistance with wildlife management and species conservation impacted by the 2019/2020 bushfire crisis. At the start of the fire season, and in response to the prolonged drought, HSI launched a Wildlife Emergency Response Fund. Funds raised have been disbursed to drought and fire impacted wildlife carers throughout the fire season and this is continuing in the aftermath to assist with ongoing wildlife rehabilitation costs and recovery, including habitat restoration. Financial grants were provided to increase capacity and resources to cope with the influx of wildlife patients. This included assistance with the purchase of feed and veterinary supplies, the building of new enclosures and irrigation systems and the planting of habitat trees and other vegetation. HSI anticipates that financial assistance of this nature will be required for several months, if not years.

² Threatened Species Bushfire Recovery Panel, Revised provisional list of animals requiring urgent management intervention <http://www.environment.gov.au/biodiversity/bushfire-recovery/priority-animals>

³ Threatened Species Bushfire Recovery Panel, Revised provisional list of invertebrates requiring urgent management intervention <http://www.environment.gov.au/biodiversity/bushfire-recovery/priority-invertebrates>

⁴ Threatened Species Bushfire Recovery Panel, Revised provisional list of plants requiring urgent management intervention <http://www.environment.gov.au/biodiversity/bushfire-recovery/priority-plants>

⁵ Threatened Species Bushfire Recovery Panel Communique 11 March 2020
<http://www.environment.gov.au/system/files/pages/effd94e2-00fc-4e4b-8692-941f90f5ad8c/files/communique-11mar2020.pdf>

HSI also deployed a Disaster Response Team to assist with the immediate wildlife search and rescue on Kangaroo Island. The team comprised experienced responders from our international disaster response team and staff from the Australian office. We mainly undertook search and rescue for native wildlife in private eucalypt plantations where we were given access. We took injured animals, mainly koalas, to the Kangaroo Island Wildlife Park where an emergency vet center had been established with support from local vets, SAVEM, Australian Armed Forces, RSPCA and several zoos.

HSI has also prepared scientific nominations for bushfire impacted species and ecological communities to be listed under the EPBC Act. HSI has nominated *Brogo Wet Vine Forests of the South East Corner Bioregion* and *Araluen Scarp Grassy Forest of the NSW South East Corner Bioregion*. HSI has co-nominated with WWF and the International Fund for Animal Welfare the koala population of Queensland, NSW and ACT for an upgraded endangered listing on the EPBC Act.

HSI notes that we intend to brief an independent consultancy to undertake research and analysis of the wildlife emergency response to the bushfires to identify the gaps in coordination and capacity across the different fire zones. We intend this research and analysis to draw on the experience of a range of organisations and individuals in the sector and hope it will lead to further detailed recommendations. HSI makes the following observations and recommendations as a result of our three direct experiences.

The wildlife care sector is largely voluntary and carers are typically self-funded and operating on very limited resources. HSI has been helping to provide immediate support for wildlife carers and to build their capacity for the future. Due to the level of investment required to prepare for the more frequent and extreme fire events we can expect with climate change, and considering the significant public service provided, HSI recommends governments play a much greater role in building this capacity.

Our experience on Kangaroo Island was that the veterinary community responded rapidly to set up a temporary vet station at the Kangaroo Island Wildlife Park and the Wildlife Park was able to expand their capacity to take in hundreds of burnt and starving animals. However, this relied on the enormous goodwill of the Wildlife Park and their own emergency fundraising, as well as financial assistance from Humane Society International to fund materials for urgently needed new enclosures. The building of the enclosures also required significant assistance from the Australian Armed Forces. We recommend state governments ensure they are ready to quickly support emergency vet stations with equipment, resources and trained personnel ahead of future disasters. Noting the enormous demand for wildlife vet care across extensive areas this bushfire season, HSI recommends investment in mobile wildlife vet clinics for deployment at future fire events, including and especially by the government agencies responsible for large forest and national park estates.

Where HSI found coordination was lacking on Kangaroo Island was in the search and rescue effort. This was left to volunteers and with no direction from the SA Department of Environment. Out of safety concerns Flinders Chase National Park was closed to these efforts. Hundreds of wild animals were left to suffer to die from burn injuries and starvation. With the volunteer effort that was available following this crisis, many more animals could have been saved or at least euthanised to end their suffering. While the safety concerns were understandable, they were not insurmountable with appropriate equipment,

training and protocols. HSI understands that this situation was by no means unique to Kangaroo Island with wildlife carers across the nation's firegrounds complaining of a similar lack of support and failure of coordination for search and rescue efforts as well as denial of access due to safety concerns. HSI recommends all state and territory governments ensure their disaster response plans include deployment of coordinated wildlife search and rescue missions in areas with high wildlife densities such as national parks.

During the 2019/2020 fire crisis there was a massive short-term volunteer response with hundreds of people offering their assistance. However, it was difficult to quickly place these people in the immediate aftermath as it requires significant coordination. HSI understands that welcome federal government funds were allocated to Conservation Volunteers Australia to help with volunteer placements and to match the need for volunteers with volunteer availability. We recommend resources be made available for training volunteers in wildlife handling and care and fire safety so that there is a pool of trained volunteers, with suitable equipment, available to deploy quickly for future fire events. This should include training coordinators to manage wildlife search, rescue and care teams. The pool of volunteer reserves and coordinators should be kept up to date ready for each fire season. This could be managed similar to the volunteer firefighter reserves.

During this fire crisis there was also a massive donation of supplies for wildlife care which required logistical coordination to manage in terms of matching donated supplies with need. It would be helpful for the donation of supplies and supply drops to be coordinated amongst fire regions. This could be part of volunteer coordinator training.

On Kangaroo Island HSI had the opportunity to test drone surveillance with thermal imaging and high-powered zoom lenses. This worked extremely well to locate relatively stationary injured animals such as koalas. We did not get this technology up and running until weeks into the rescue effort. Had we managed to get it operational in the initial weeks after the fires it would have rapidly increased the efficiency with which we would have been able to locate burnt and starving koalas in need of veterinary care. HSI recommends governments and wildlife rescue organisations such as WIRES invest in this technology and the training necessary for its operation in order to greatly improve search and rescue efforts after future fire events, particularly in koala habitats. We are willing to share our experience with the use of this technology with interested agencies.

While acknowledging the unprecedented demands on the South Australian Department of Environment during the bushfire crisis, HSI was surprised there was not more intervention in the management of rescued koalas on Kangaroo Island. The previous abundance of koalas on Kangaroo Island, not naturally indigenous to the island, had caused tensions and conflicts with conservation objectives. A contraception program has been underway and there have been calls to cull the species (which HSI opposes). HSI is unaware of any direction to administer contraception to rehabilitated koalas before re-introduction. HSI recommends all levels of government ensure they have up to date standardised protocols for the reintroduction of rehabilitated wildlife and are ready to provide that advice to local wildlife carers.

HSI has been surprised by reports that permits to take or harm native wildlife such as wombats and kangaroos, for example damage mitigation permits, have still been sought and granted in areas impacted by fires. HSI recommends that such permits be suspended after fire events so that impacts on wildlife can be assessed.

There are also implications of the 2019/2020 bushfires on the continued operation of the various Regional Forestry Agreements (RFA) in place around the country, and some Wildlife Trade Operations (WTO) or Accredited Management Plans (AMP) declared in relation to native species, for example the kangaroo. HSI recommends an urgent suspension and review of these approvals in light of the bushfire impacts.

Recommendations:

- All levels of government ensure the funds they have dedicated to bushfire recovery include allocations to build the capacity and resources of volunteer wildlife carers so that they are better equipped to deal with the increased demand for wildlife care after future fire events.
- Resources should be made available for training volunteers in wildlife search and rescue, handling and care, as well as fire safety, so that there is a pool of trained and suitably equipped volunteers available for future fire events for each region at risk of bushfires. This should include the training of team coordinators.
- State government agencies responsible for fire prone forest and national park estates should be ready to lead and coordinate wildlife search and rescue efforts and provide access to firegrounds.
- State government agencies responsible for fire prone forest and national park estates should investment in mobile wildlife vet clinics for deployment at future fire events.
- We recommend state and territory governments ensure they are ready to quickly support emergency vet stations in future disasters with equipment, resources and trained personnel.
- HSI recommends governments and wildlife rescue organisations invest in drone technology, and the training necessary for its operation, in order to greatly improve wildlife search and rescue efforts after future fire events, particularly in koala habitats.
- HSI recommends governments of all levels ensure they have up to date standardised protocols for the reintroduction of rehabilitated wildlife and are ready to provide that support and advice to local wildlife carers.
- We recommend that authorities to harm or take wildlife such as Damage Mitigation Permits be suspended during and following disaster events that impact upon wildlife.
- RFA and wildlife trade operations approved for bushfire impacted species such as kangaroos need to be suspended and reviewed to ensure they do not compound bushfire impacts on wildlife species and ecological communities and impede their recovery.

f) iii. Land-use planning, zoning and development approval (including building standards), urban safety, construction of public infrastructure, and the incorporation of natural disaster considerations.

The 2019/2020 bushfires have fundamentally changed the landscape that supports Australian wildlife. Huge swathes of habitat for Australian animals, including many threatened species listed under the EPBC

Act and equivalent state laws have been heavily impacted. The Threatened Species Recovery Panel appointed by the Federal Environment Minister has identified 119 vertebrate species, 191 invertebrate species and 471 plant species that are priorities for management intervention⁶. Federal Department of Agriculture, Water and Environment mapping indicates that bushfires have affected approximately 54% of the Gondwana Rainforests of Australia (NSW, Qld) and 81% of the Greater Blue Mountains Area (NSW). Given the scale of devastation, and the community concern about the survival of Australian wildlife and their habitat particularly in areas already earmarked for clearing, HSI and the Environmental Defenders Office have recommended that there should be consequences for immediate planning decisions.

HSI and the Environmental Defenders Office wrote to the federal environment minister to recommend the temporary suspension of current decision-making processes under the EPBC Act in relation to proposed actions that are likely to impact threatened species or ecological communities in areas heavily affected by the bushfires. This temporary suspension would allow time for a full assessment of the impacts of the bushfires to be conducted to inform the decision-making process going forward.

The catastrophic impacts of the bushfires may also have significantly altered the magnitude of the impacts of actions for which an approval is already in place. For example, for some threatened species and communities that have been heavily impacted by the bushfires, the impacts of an approved action may now be much more significant. Indeed, in some cases, the combination of the impacts of specific actions and the bushfires may have created entirely new significant impacts on threatened species and communities that were not present when the actions were originally approved. To ensure the ongoing protection of threatened species and communities from those specific approved actions, we recommended the minister may need to use powers under the EPBC Act to vary, condition or suspend existing approvals to allow for appropriate protection measures. In extreme cases, for example where an action now poses a risk of extinction, consideration may need to be given to revoking an approval.

Recommendations:

- Planning decisions need to take into account bushfire impacts to ensure that development approvals underway do not compound bushfire impacts and impede recovery of species and ecological communities. This could include a suspension of approval decisions until appropriate assessments of bushfire impacts have taken place, requiring updated impact assessments, varied decisions, new conditions on approvals and in extreme cases revocation of approvals.

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⁶ <http://www.environment.gov.au/biodiversity/bushfire-recovery>