



Victorian
Farmers
Federation

SUBMISSION

Intent to vary Code of Practice for Bushfire Management on Public Land

6 May 2022

OUR POSITION

Thank you for the opportunity to provide a submission to the Intent to vary Code of Practice for Bushfire Management on Public Land. We understand that the changes are minor and relate to an extension until 2024. It is disappointing however that opportunities have not been taken to make interim improvements to the code.

VFF has made many submissions to DELWP on fire and emergency management over the past five years. There has been little change from these processes. It is important that DELWP understands that IGEM Terms of Reference did not allow the considerations of agricultural aspects of 'life and property'.

VFF is identifying the issues that must be properly reviewed over the next 2 years to ensure that the Code of Practice is able to deliver its primary objectives as the current methodologies of using a dwelling as the indicator for life and property is leading to perverse outcomes for agriculture and embedding an urban bias across preparedness, response and recovery activities.

Recommendation:

1 That agricultural be specifically identified in the objectives statement to ensure that there are outcomes strategies and actions for agriculture in prevention, preparedness, fuel management, response, recover and monitoring activities.¹

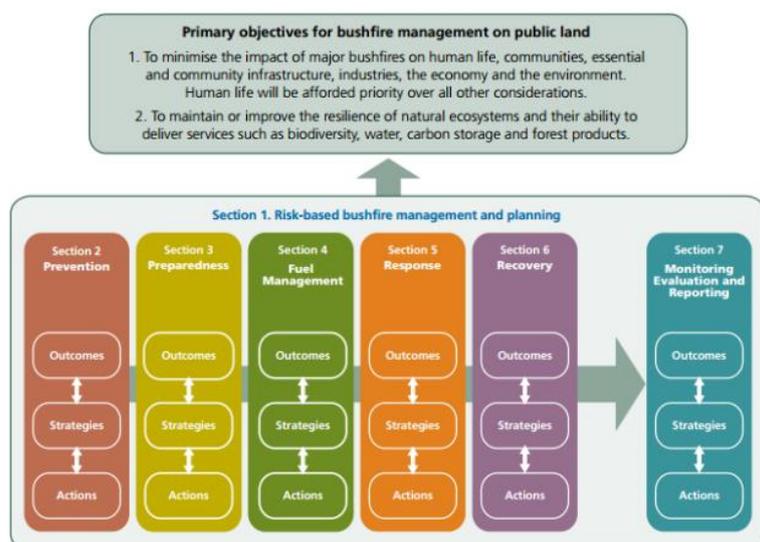
2 That paragraph 23 of the Code be immediately amended to recognise that agricultural industries are directly impacted by management activities.

3 That urgent review of planning scheme controls is undertaken by DELWP to ensure safety and fuel management objectives are allowed to be considered on private land to ensure paragraph 28 can be achieved.

4 That VFF is consulted in how best to understand landscape level objectives (paragraph 30).

5 That the VFF be included in risk analysis processes under paragraph 31 to ensure that multi tenure considerations are delivered.

6 That VFF is asked to provide local experts to ensure knowledge of local fire behaviour and impacts on farming businesses / regional economies are achieved (paragraph 32).



¹

7 That processes are in place to ensure local farming communities are an empowered partner in shared responsibility (paragraph 33).

8 That the application of the risk process ISO 31000 be discussed and assessed by Land and Fire Stakeholders Forum members to ensure the dwelling based residual risk model delivering the appropriate level of management.

9 That DELWP outline to VFF how it proposes to amend the Bushfire Management Planning framework to address the issues raised by VFF in relation to 'property' matters, the Strategic Bushfire Assessment Process and Delivering Bushfire Reform. (Paragraphs 41 and 42)

10 That DELWP work with VFF to determine the potential impacts of fire and fire management regimes on agricultural values to ensure that paragraphs 52 to 56 properly reflect the primary objective in relation to economy.

11 in relation to Bushfire Management Planning process (paragraphs 60 to 63) DELWP works with VFF to determine state-wide considerations and methodologies for agriculture and in the identification of regional representatives to input into assessment processes.

12 In relation to Strategic planning (paragraphs 64 to 68) DELWP work with VFF to identify the key measurables and considerations for agriculture in the system, including the issues raised in previous submissions of the VFF.

13 That the Prevention outcome be reviewed immediately to ensure that it is addressing the correct measurable in relation to the higher order objectives.

14 That the Asset Protection Zone be applied in accordance with what is written in paragraph 126. Property is not just a dwelling. It is the means of earning a living – including sheds, machinery, fodder, crops, livestock and fences.

15 That DELWP work with VFF as a matter of urgency to improve the understanding of agricultural impacts within the response elements of the code (paragraphs 150 to 154).

16 That DELWP work with VFF to develop a better recovery processes (paragraphs 181 to 188) for both impact on farms from fires on public land and impact on farms from fire management activities. This should include preparation of 'access plans' that clarify the key actions that need to be taken in on property activity to protect property and minimise the impact of fire and / or management activities on fences, fodder, water supply, crops, livestock and machinery.

17 That DELWP ensure that replacement fencing is not subject to native vegetation regulations.

18 That VFF be included as a key stakeholder in monitoring, evaluation and reporting of bushfire management actions to ensure property values / impacts are holistically considered. (paragraphs 198 to 223).

Please contact Lisa Gervasoni, Senior Stakeholder Policy and Advocacy Advisor at lgervasoni@vff.org.au to arrange a meeting to discuss how to facilitate better involvement of the VFF and understanding of agricultural aspects of life and property in fire management activities by Forest Fire Management Victoria.

Gerald Leach
Chair Environment Planning and Climate Change Committee
Victorian Farmers Federation

The Victorian Farmers Federation

Victoria's agricultural production accounts for over \$13 billion of Victoria's economy and over 25 per cent of the State's exports per annum. Victoria's farmers produce high quality food and fibre, produced to high standards of safety, with little taxpayer support, and to some of the strictest environmental and highest animal welfare controls in the world.

The Victorian Farmers Federation (VFF) represents a farming community which creates a profitable, sustainable and socially responsible agriculture sector connecting with consumers.

We have a proud history representing Victoria's farm businesses since 1979 – primarily family farms that produce the eggs, grain, fruit and vegetables, meat, and milk that help to feed Victoria's six million people, and the bigger global community, every day.

The VFF consists of commodity groups: dairy (United Dairyfarmers of Victoria), grains, horticulture (including Flowers Victoria), intensives (chicken meat, eggs and pigs), and livestock – and expert committees representing; water, land management, agricultural and veterinarian chemicals, farm business and rural development, and workplace relations.

Our purpose is to make Victorian farmer's lives better; enhancing Victoria's future.

Our mission is to ensure a community of farmers creating a profitable, sustainable and socially responsible agricultural industry connecting with all Victorians.