



**Conservation Council  
of South Australia Inc**

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**Native Vegetation Council Secretariat  
GPO Box 2834  
Adelaide  
SA 5001**

18<sup>th</sup> November 2008

**Re: Code of Practice for the Management of Native Vegetation to Reduce the Impact of Bushfire**

Dear Sir/ Madam,

The Conservation Council of South Australia Inc (CCSA) is the peak conservation body for South Australia, representing over 55 of the State's environment and conservation organisations.

CCSA is pleased to provide the following comments relating to the Draft Code of Practice for the Management of Native Vegetation to Reduce the Impact of Bushfire.

- CCSA supports the Bushfire Risk Management Framework and the three elements of the framework.
- CCSA notes however that this code does not address the first of these elements with respect to '*planning processes that ensure built assets are not placed in areas of high bushfire risk*' and suggests the need for a process that links and integrates this code to other planning processes that address this first element.
- CCSA suggests that in the summary of Legislation – the Native Vegetation Act is in place to 'conserve' rather than 'preserve' native vegetation.
- CCSA endorses the (four) Principles of Fire Management Zones.
- CCSA suggests that for Conservation Land Management Zone ecological principles and biodiversity conservation imperatives should provide the basis for management – including prescription burning.

CCSA also makes the following requests:

- Adequate resources must be made available for the Code of Practice to be implemented and managed to meet the objectives for the code;
- The delegations must be supported by clear guidelines;
- Delegates must be adequately trained and accredited;
- Development must not be approved in 'high risk' areas and in 'moderate risk' areas appropriate building standards must be enforced following development approval;
- For new development approvals, a condition for approval must include the caveat that Bushfire Buffer Zones must be provided within the approved development site and not in adjacent remnant bush-land;

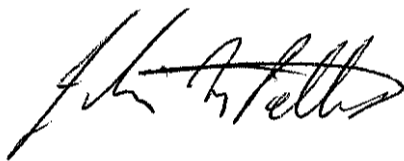
**A Healthy Environment for South Australia**

- Re: Attachment 7 Prescribed *Burning Code of Practice* and the Guidelines for Delegated Authority to SA CFS Officers.... - "*Guidelines for All Approvals – Fire Management Works*":
  - The Native Vegetation Fire Management Plan currently requires less than a biological survey despite speaking about the need to consider critical habitats for native fauna.
  - Biological surveys must be undertaken (by suitably qualified people) prior to any delegated vegetation clearance approval, where such data does not exist for the site in question.
  - These should be included in the '*Guidelines for All Approvals*' and in Attachment 7 because the State biological database is inadequate and significant vegetation may otherwise be overlooked.
  - This biological data may then also be utilised as a baseline for monitoring and research that is referred to in *Attachment 7, Part 9 Operations*.
  - The Native Vegetation Council has a training program in place for accredited assessment officers that could be utilised for such purposes.
  - Provisions for resourcing post-prescribed burning monitoring and weed management is required.
  - Prescribed burning requires a process whereby the individual District Bushfire Prevention Committees liaise to ensure accumulative impact on wildlife does not occur through simultaneous burning programs. Prescribed burning needs to be planned and undertaken on a landscape scale keeping this in mind.

CCSA also would like advice as to what review process will be implemented within what time frame, in order to assess the effectiveness of this Code of Practice against the objectives; and to determine what changes might be required to improve the operation of the code.

CCSA commends the efforts of the Reference Group.

Yours Sincerely



Julie Pettett  
CEO CCSA