



# Sutherland Shire Environment Centre

SSEC

Dharawal Country | office@ssec.org.au | www.ssec.org.au | PO Box 589 Sutherland NSW 1299 | ABN 96 127 431 611

30 November, 2023

Sutherland Fire Control Centre

By email: [illawarra.sutherland@rfs.nsw.gov.au](mailto:illawarra.sutherland@rfs.nsw.gov.au)

cc: [DSteinwall@ssc.nsw.gov.au](mailto:DSteinwall@ssc.nsw.gov.au)

[echia@nature.org.au](mailto:echia@nature.org.au)

Re: Sutherland Draft Bush Fire Risk Management Plan

Sutherland Shire Environment Centre is a not-for-profit community organisation that has been advocating for the environment in the Sutherland Shire and surrounding bio-regions since 1991. We are also a member group of the Nature Conservation Council (NCC), and in 2021 were named Group of the Year in the NCC NSW Environment Awards, which recognise and celebrate the outstanding commitment and success of campaigners, grassroots environmentalists and conservation groups across the state.

We welcome the opportunity to provide feedback on the Sutherland Shire Bush Fire Risk Management Plan. Our interest is specifically concerned with the 'environmental assets' component of the plan. One point of concern is that while the draft plan references environmental assets, the focus areas appear centred around the built environment.

Several areas of Regional Koala Significance (ARKS) have been included in the plan, but these areas do not encompass all koala populations across the Shire. A significant, known koala population in the Engadine / Heathcote focus area is not included as an Area of Regional Koala Significance (ARKS).

A Shire wide Bush Fire Risk Management Plan must account for the fact that koalas inhabit more areas in the Shire than are shown on this plan. The plan should supply information about how the RFS will manage all the areas koalas inhabit, including the koala corridors which link the focus areas. Koalas are an endangered species, environmental assets of intergenerational significance. Failing to properly recognise the full range of koala habitat and account for this in the Bushfire Management Plan would subject this endangered species to unacceptable risk.

We value the important work carried out by dedicated RFS volunteers, but it would reassure the community, and our members, to know the RFS was fully addressing the need to protect endangered species. Will drone surveys be used to inspect hazard reduction burn areas before these burns take place, and accounting for any animals there? There has been a great deal of discussion about the value of Aboriginal cultural cool burning recently. Will this bushfire management plan be taking into account these developments?

Members of the public contacted us with a range of concerns regarding the recent Holsworthy hazard reduction burn. We received advice from the RFS, but there was no transparency about whether animals in that burn area were indeed protected during the burn, and afterwards. Will the need for transparency and better communication be incorporated in this plan? The burn covered a huge area. Why was it necessary to do such a large burn all at one time? Shortly after the burn a koala was hit and killed on a section of Heathcote road adjacent to the burn area. It is not just a matter of animals being injured during a burn, but whether they will be driven from an area afterwards by the need to seek new food sources. Best practice fire management would take into account these issues.

We note that the Sutherland Shire Rural Fire Service is part of a consultative Committee which includes Councillors. Accounting for endangered species should be a central concern for the RFS, and any plan must take into account the work of Council Officers and consultants involved in the upcoming Sutherland Shire Council Koala Management Plan, and those involved in the upcoming Sutherland Shire Koala SEPP. It is not clear specific advice from this group has been incorporated in this draft plan.

It also unclear as to whether the Sutherland Bush Fire Management Committee includes advice from government agencies focused on koala protection, the NSW Department of Planning and Environment Koala Strategy group, and the South West Sydney Koala project team. Has consultation with these groups taken place? If not, it is an omission that should be addressed. I note again that failing to properly recognise the full range of koala habitat and account for this in the Bushfire Management Plan would subject this endangered species to unacceptable risk.

One other point to note is that the NSW government database Bionet records shows koala sightings across the LGA, but recent news reports have noted that Bionet records have not been updated, and are in some cases over four years out of date:  
<https://www.abc.net.au/news/2023-09-04/nsw-bionet-missing-four-years-wildlife-recue-data-/102805330>

We would appreciate a response to issues raised in this submission so we can reassure our members that the Sutherland RFS is addressing these points.

Thank you again for the valuable work your agency and volunteers do to protect the beautiful area we live in.

Kind regards,

A handwritten signature in black ink, appearing to be 'Catherine Reynolds', written in a cursive style.

Dr Catherine Reynolds  
Convenor Koala Advocacy group