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Mr Mick Keelty
SA Fire & Emergency Services Commission
South Australian 2019-2020 Bushfire Review
GPO Box 2706
ADELAIDE SA 5001

Sent electronically:

27 March 2020

Dear Mr Keelty

Re: Independent review into South Australia's 2019/20 bushfire season

Grain Producers SA (GPSA) is the peak industry body for South Australian grain growers. GPSA is non-political and represents producers to government, the community and industry, including grain marketers, exporters, storage and handlers, researchers and farm input suppliers.

We develop and implement policies and projects that promote the economic and environmental sustainability of South Australian grain growing businesses.

We welcome the opportunity to provide this written submission to the Independent review into South Australia's 2019/20 bushfire season.

As the peak industry body for South Australian grain growers, I confirm that GPSA is willing to provide evidence at any hearings that the SA Fire & Emergency Services Commission may choose to hold.

If you have any queries, please don't hesitate to contact me on 1300 734 884.

Yours sincerely



Caroline Rhodes

Chief Executive Officer

1.0 Introduction

Grain Producers SA makes this submission to the Independent Review into South Australia's 2019/20 bushfire season in support of the fire prevention and response activities undertaken by South Australian grain producing businesses.

GPSA has previously highlighted the pro-active approach that grain producers take through our advocacy in relation to the South Australian Parliament's *Select Committee on Fire and Emergency Services* in 2019.

The grain production community in South Australia has an extremely high awareness of the risks of uncontrolled fire and dangerous conditions for fire, as well as the experience and capacity necessary to mitigate fire spread and aid agencies to extinguish fire.

Grain producers take their responsibility to operate in safe conditions extremely seriously. They take action on their own property, and also in their local community through high levels of firefighting equipment ownership and CFS membership.

We note that grain producing regions of SA were largely unaffected by the 2019/20 bushfire season with the exception of Kangaroo Island and the Yorketown region on the southern Yorke Peninsula. GPSA is not aware of any significant fires in 2019/20 that started as a result of grain production activities.

2.0 Existing Requirements

Primary producers already have a range of legislative fire-related obligations in place. *The Fire and Emergency Services Act 2005* imposes a duty on landowners to take reasonable steps to prevent or inhibit the outbreak and spread of fire, as well as to protect property and human life from fire. Breaches of this duty carry a maximum penalty of \$5,000.

We note that further changes to the Act are planned following an inquiry conducted by the *Select Committee on Fire and Emergency Services*.

The grain industry has voluntary guidelines for high-risk on-farm activities, namely the [Grain Harvesting Code of Practice](#) ('GHCP') and the [Broad Acre Burning Code of Practice](#) ('BABCP'). These codes are designed to reduce the threat posed by fire, and to prevent its spread.

3.0 Grain Harvesting Code of Practice ('GHCP')

The GHCP imposes a range of obligations on primary producers. This code requires compliance with Regulations 37 & 38 of the *Fire and Emergency Services Act 2005*, which concern the use of stationary engines to auger a crop, and the use of internal combustion engines to harvest or move a flammable crop.

This code also requires:

- That grain harvesting operations be suspended when the local actual [Grassland Fire Danger Index](#) ('GFDI') exceeds 35.
- That crop residues on machines be kept to an absolute minimum, especially in areas of potentially high fire risk, such as engines, exhausts or brakes.
- That operators adopt a regular maintenance program, both before and during grain harvest operations, paying particular attention to wearing parts and bearings.

- That operators are aware of the construction materials on harvesting machines and take reasonable steps to reduce any potential build-up of static electricity through harvesting operations.
- That operators have immediate access to a UHF radio or mobile phone.

There are also a range of other recommended practices, including seeking information on voluntary harvest bans, establishing fuel breaks, and having fire-fighting material available.

The GFDI (see figure 1) is a mathematical relationship between air temperature, relative humidity and wind speed and impacted by the curing factor, or greenness, of vegetation. GFDI's of 35 or above are values that correspond to the likelihood that fires will get out of control.

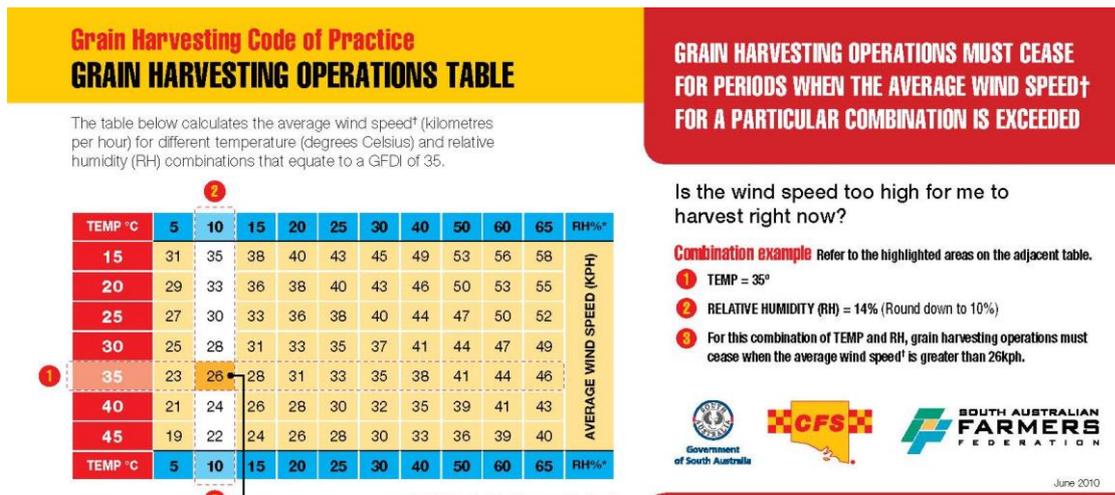


Figure 1: The Grassland Fire Danger Index calculation table.

Both GPSA and the CFS recognise that it is impossible to fully eliminate the risk of fire in grain harvesting operations. The *'Know Your Code'* campaign provides a simple checklist for growers to ensure they are adhering to the on-farm actions of the code. An [easy to read poster](#) sets out 5 simple steps that producers can take to help *reduce* the risk of harvester fires. These are:

1. Preparation,
2. Maintenance,
3. Monitoring,
4. Safe operations, and
5. Communication.

In many areas across the state, grain producers have taken the initiative to form farm groups which actively monitor weather conditions. These groups consider local variables and use community peer pressure to self-impose harvest bans when conditions become marginal or when there is an upward trend in the GFDI.

Many groups have established a comprehensive mobile messaging system that sends out alerts to other producers and other related industries using data made available through Bureau of Meteorology weather stations, privately owned stations, and in-field measurements. These groups send alerts advising producers and the community to review or cease harvesting operations based on the GHCP, as well as alerts regarding fires and other weather conditions.

GPSA welcomes the opportunity to review the Codes in partnership with CFS to further develop local collaboration and preparedness for the coming season.

This is yet another example of SA's grain industry taking the initiative to self-regulate to mitigate and prevent fire risk, as recognised by Parliament's Select Committee on Fire and Emergency Services:

"The success of the Code in the grain industry highlights the important role that industry-led codes of practice can play in minimising fire risk across the State."

4.0 Broad Acre Burning Code of Practice ('BABCP')

The BABCP is a voluntary code that outlines a range of practices that should be undertaken prior to broad acre stubble burning in order to reduce the chance of a stubble burning operation becoming uncontrollable. This includes not burning when the GFDI exceeds 20, having appropriate water available, testing burn methods, and notifying neighbours and nearby road users.

Stubble burning is a rarely used agronomic practice that removes residual crop stubble in order to aid weed and pest control. While infrequent, stubble burning is a highly valued agronomic tool that is preferable to the alternative practice of tilling soil given the loss of organic material, moisture, nutrients, and topsoil that comes as a result of tillage. Growers wish to retain access to this practice.

In addition to the above requirements, the BABC also recommends:

- That burning not take place when the GFDI exceeds 20.
- That no burning takes place on a total fire ban day, except where a permit has been issued under the *Fire and Emergency Services Act 2005*.
- That burning not take place where the weather the day after the proposed burn is unfavourable.
- That a four-metre fuel break be established.
- That adequate firefighting resources be readily available when conducting a burn, including Farm Fire Units ('FFUs').
- That neighbours be notified before a burn is to take place.
- That operators have immediate access to a UHF radio or mobile phone.

Additional requirements for smoke management and safe burning methods are also outlined in the BABCP.

Further changes to the BABCP are currently envisaged, reflecting best practice in mitigating any potential for smoke taint in wine grapes prior to vintage.

5.0 Sustainable farm practices

GPSA notes that the development of sustainable farm practices including 'no-till' has resulted in a greater fuel load remaining in paddocks over the summer months.

As its name suggests, no-till farming means that grain producers avoid tilling paddocks and instead choose to retain stubble. A stubble load of approximately two tonnes per hectare is considered average.ⁱⁱ

As highlighted above, stubble retention confers a variety of benefits for producers, including water and nutrient retention, increased organic matter, and the protection of valuable topsoil. The advent of no-till has allowed for increased production and other environmental benefits despite dry conditions.

In addition to stubble fuel loads, the nature of SA's grain industry means that higher fuel loads (in the form of grain) are prevalent in paddocks from October through to January, depending on the region.

While GPSA appreciates that Government may see fuel loads in agricultural areas as a risk in the bushfire season, Government should be assured that producers take active steps to mitigate this risk and are prepared to respond in the event of a fire, including through the measures highlighted below.

6.0 Farm fire-fighting units

Producers throughout South Australia continue to invest in farm firefighting units ('FFUs') as part of their risk mitigation strategy and in connection with the recommended practices under the Grain Harvesting Code of Practice. FFUs are often former CFS appliances that have been purchased by producers, or utility vehicles that have been fitted with water tanks and other necessary equipment to combat fire.

FFUs play an important role in South Australia's ability to prevent and manage the risk of fire as they:

- Are kept in close proximity when activities such as stubble burning or grain harvesting are underway,
- Are crewed by locals that are familiar with the region,
- Can often respond to outbreaks of fires (including those that are not related to the grain industry, such as bushfires) more quickly and with more flexibility than CFS appliances, and
- Are not funded at Government expense.

GPSA believes that the effectiveness of FFUs can be improved by enabling more flexible road access for FFUs (as the circumstances reasonably allow) under the Guidelines for Managing Road Closures during Bushfires.

South Australia's Country Fire Service has recognised the vital importance of FFUs through the publication of the Private Farm Fire Unit Handbook. The Handbook is designed to support local arrangements and ensure a consistent approach to the use of FFUs during bushfire events. FFUs commonly assist broader fire-fighting efforts through:

- Initial attack,
- Providing tactical support in conjunction with CFS tankers,
- Blackout operations,
- Patrolling, and
- Providing local knowledge.



Figure 2: Farm Fire Units assisting CFS in battling bushfires. Source: CFS Private Farm Fire Unit Handbook.

First response grain producers point to their unconventional confrontation to fire starts as key to mitigating fire spread. **GPSA would welcome government consideration of training and support for FFUs to improve communication and replenishment of supplies during the fighting of fires.**

7.0 Fuel breaks

Under the Grain Harvesting Code of Practice, producers are encouraged to establish a minimum 4 metre fuel break around the perimeters of crops or paddocks or lay out strategic fire breaks around the property.

While these measures have an obvious economic impact on growers through maintenance and opportunity costs in foregone crop output, growers recognise the essential role that fuel breaks play in preventing the spread of fire.

Fuel breaks are also commonly established around workshops, fuel & chemical storage areas, and hay stacks to ensure that assets and flammable materials are separated in the event of a fire.

Many grain producers are frustrated with the inconsistent use of fuel breaks in regional areas, including roadside verges and native vegetation given the potential for the further egress of fires. **GPSA would welcome efforts by government to apply a consistent fuel break policy to allow for the maintenance of roadside verges and native vegetation as a risk-management approach.**

8.0 Conclusion

South Australia's grain producers are leaders in fire risk mitigation and in responding to a breakout of fire. They have a thorough understanding of fire risk in their business and in their broader community, and often go unacknowledged for their efforts in preventing and fighting fire.

Producers have implemented a range of measures that are designed to promote risk-awareness and community safety through industry self-regulation. These efforts have been highly successful and are best augmented by government providing the necessary supports and information to enable this continued behaviour.

GPSA notes that the SA Government is currently considering its response to the findings of the South Australian Parliament's *Select Committee on Fire and Emergency Services*. GPSA supports the full implementation of those recommendations as attached.

ⁱ Select Committee on the Fire and Emergency Services (Miscellaneous) Amendment Bill, 2019. Final Report. [online] Parliament of South Australia. Available at: <<https://www.parliament.sa.gov.au/Committees/Committees-Detail>> [Accessed 18 March 2020].

ⁱⁱ Grains Research and Development Corporation. 2020. *Stubble: Keep It Or Burn It? Stubble Star Provides An Answer For No-Till Sowing*. [online] Available at: <<https://grdc.com.au/resources-and-publications/groundcover/ground-cover-issue-48/stubble-keep-it-or-burn-itstubble-star-provides-an-answer-for-notill-sowing>> [Accessed 18 March 2020].



SELECT COMMITTEE ON THE FIRE AND EMERGENCY SERVICES (MISCELLANEOUS) AMENDMENT BILL

FINAL REPORT

*Tabled in the House of Assembly and published pursuant to Standing Order 346
4 April 2019*

First Session, Fifty-Fourth Parliament

RECOMMENDATIONS

The Select Committee on the Fire and Emergency Services (Miscellaneous) Amendment Bill recommends that:

1. The proposed powers outlined in clause 23 of the Bill be introduced, subject to the amendments recommended by this report.
2. Clause 23 of the Bill be amended to clarify which officers will be authorised to exercise the proposed powers to direct that a prescribed activity be ceased or not commenced. This power should be limited to South Australia Police officers.
3. The South Australian Government develop enforcement criteria and guidelines for the exercise of the proposed powers. The South Australian Government should consult with industry bodies and relevant stakeholders in developing these criteria and guidelines.
4. Clause 23 of the Bill be amended to require that the exercise of powers in section 82 must take into account any relevant industry-led codes of practice, including the *Grain Harvesting Code of Practice*.
5. The South Australian Government support and encourage all relevant stakeholders, including industry peak bodies, to implement and review relevant codes of practice, including developing codes of practice for prescribed activities that may cause fires. This should include developing a mechanism to recognise codes of practice for the purposes of exercising the proposed powers outlined in clause 23.
6. The South Australian Government provide support for ongoing education to stakeholders and the broader community about fire prevention and relevant codes of practice.
7. The South Australian Government review existing community initiatives aimed at fire prevention, reducing fire risk and information gathering and sharing, and provide additional funding and support where appropriate, such as further developing local weather monitoring networks and SMS alert systems.
8. The Country Fire Service (CFS) consider measures to improve communication, engagement and consultation with regional communities in decision-making processes, particularly in relation to the exercise of the proposed powers set out in clause 23 of the Bill.
9. The South Australian Government review ongoing and periodic mental health and other wellbeing support services available to communities affected by fires and provide further support where appropriate.
10. The South Australian Government review whether further changes to the *Fire and Emergency Services Act 2005* may be appropriate, based on further consultation and drawing on evidence provided to this Committee.