

Guidelines for Community (Low Risk) Cultural Burning on NPWS Managed Lands

Risk Assessments and Risk Controls for NPWS Fire Managers

PURPOSE OF THE GUIDE

This guide is for NPWS staff considering undertaking a community based, low risk, cultural burn or a cultural burn program on NPWS managed lands. Compliance with the guide will ensure that minimum OEH standards for risk assessments and risk controls are met.

BACKGROUND

NSW Government agencies are required to provide a safe workplace for staff, volunteers and visitors. Identifying, assessing and reducing risks to acceptable levels is the primary focus of the NPWS Fire Management Manual (FMM). NPWS management may choose to apply all the requirements of the FMM to any burn, regardless of its risk profile, if the safety or reputation of the people or the organisations involved could be compromised.

NPWS supports the principles of Aboriginal community engagement and connection to Country as described in the Aboriginal Partnerships Policy and seeks to facilitate cultural fire practices on NPWS land. At times, cultural fire practices may involve Aboriginal people, including children and the elderly, observing or participating in burns. However, these Aboriginal people may not have the fire competencies or personal protective equipment (PPE) specified in the FMM. NPWS is committed to facilitating the involvement of these people in burning on NPWS lands. For the safety of all, these activities need to be carefully managed.

IDENTIFYING A PLANNED BURN AS A LOW RISK CULTURAL BURN

NPWS defines culturally informed burning as any burn with cultural burning objectives and Aboriginal community leadership in planning and approval. However, culturally informed burning may not always have Aboriginal people involved on the fire ground.

For operational purposes, low risk burns that involve Aboriginal people on the fire ground who do not meet the competency, PPE or other provisions of the FMM are called community cultural burns. While any burn can have cultural objectives and values, only low risk burns are suitable for identification as community, low risk, cultural burns.

This guideline identifies 26 common risk controls, or requirements, specifically applicable to community, low risk cultural burns. The planning and conduct of community, low risk, cultural burns must meet each of these requirements. These requirements form the basis of job safety analyses, check lists and briefings for burn planners, community liaison people, incident controllers and firefighters. These requirements are based on the NSW Rural Fire Service (RFS) *Standards for low intensity bush fire hazard reduction burning (for private landholders)* and are referenced in the FMM.

For the purpose of organisational approval, when all requirements of the guidelines are met, the burn is considered to be a community, low risk, cultural burn. This approval allows for exemptions to the competency and PPE provisions of the FMM because a stringent assessment of risks has been completed requiring the implementation of alternative risk controls. A copy of the requirements is provided at the end of this guide.

Risk Class	Burn Description	Burn Purpose	Relationship to FMM	Aboriginal Engagement
Very low risk	Very small contained fires like campfires and smoking ceremonies, that do not require firefighting appliances for management but may have firefighting appliances in attendance.	Cultural Ceremonial Cooking Warmth Safety Social Educational	These fires are outside the scope of the FMM. There are no restrictions to Aboriginal participation in these burns. Risk is managed through controls provided under NPWS Plans of Management and NPWS or RFS Park or Total Fire Bans. Endorsement for campfires and smoking ceremonies by NPWS is not required.	Aboriginal people without fire competency can conduct and participate
Low risk	Cool (low intensity), slow moving burns, often patchwork, that behave in a predictable manner and can be ignited and monitored on foot. They have short duration and are self-extinguishing, so require minimal mop up and patrol but will have firefighting appliances available on standby.	Cultural Ceremonial, Social, Hazard Reduction, Ecological, Scientific Research, Educational	The FMM will reference the risk control requirements in this guide which provides an alternative to the standard provisions in the FMM. This allows Aboriginal people who do not meet fire competency or personal protective equipment standards specified in the FMM to be on the fire ground and to be involved in a burn.	Aboriginal people without fire competencies participate or observe
Moderate or higher risk	Fast moving, erratic or otherwise complex low intensity burns and all moderate to high intensity burns. Burns that consume elevated and mid-story fuels. Burns of a size and/or nature that require firefighting appliances for ignition, patrol or mop up.	Cultural Hazard Reduction, Ecological, Scientific Research, Educational	All normal provisions of the FMM apply. Risks are managed through the provisions of the FMM. Only people who meet FMM specified competency and personal protective equipment standards can be on the fire ground and be involved in the burn.	Aboriginal community can assist with planning and monitoring. Only Aboriginal people with fire competency can attend the fire ground.

ROLES AND ORGANISATION OF PEOPLE ATTENDING A LOW RISK CULTURAL BURN

A community liaison person is required to liaise between the Aboriginal people attending the burn and the burn planner, incident controller and firefighters. The community liaison person will provide or facilitate the provision of informed cultural consents for the burn. The community liaison person will also be required to collect the names of all those attending. The community liaison person will also organise transport, accommodation, meals and other items as required for the Aboriginal people attending. The community liaison person should be aware of any basic NPWS requirements and may brief on these and organise community attendees into participants and observers depending on preference and capacity. The community liaison person can be a NPWS staff member or a community representative.

A participant of any age may, where approved by the Incident Controller, actively continue ignition beyond the initial or ceremonial start point or assist in control of the fire by removing fuels. Participants are not permitted to use drip torches, hoses, pumps or other fire-fighting equipment unless they are also competent firefighters and have the Incident Controllers approval to do so. Participants must always remain within the line of sight and under supervision of a competent firefighter. Participants must have completed cultural fire awareness induction, received a burn

briefing (that includes job safety briefing) and have personal protective equipment as per RFS *Standards for low intensity bush fire hazard reduction burning (for private landholders)*.

An observer, of any age, may be engaged in the initial or ceremonial ignition but must otherwise remain in a safe area defined by the Incident Controller and under supervision of competent firefighters. Observers must always remain within the line of sight and under supervision of a competent firefighter. Observers may have completed a cultural fire awareness induction but must have received a burn briefing (including job safety briefing) and must have personal protective equipment as per RFS *Standards for low intensity bush fire hazard reduction burning (for private landholders)* unless otherwise determined by the Incident Controller.

A competent firefighter is a person holding current NPWS or RFS crew member competency, or better, at the time of the burn. Competent firefighters meet all training, briefing and personal protective equipment requirements of the FMM.

The Incident Controller carries ultimate authority over the burn and is responsible for the safety of all people present at the burn as detailed in the FMM. The Incident Controller's span of control and command is as per the FMM.

Aboriginal people who are attending the burn will be signed on as volunteers as defined in current OEH Volunteer Policy and Procedures. Contact should be made with the Volunteering and Participation Unit if further advice is needed. NPWS volunteers are covered for accident and public liability insurance under the Treasury Managed Fund.

COMMUNITY LOW RISK CULTURAL BURN REQUIREMENTS (Risks Assessment and Controls)

These requirements are to be met before a low risk cultural burn can be approved or ignited. They determine if a burn is suitable for consideration as a low risk cultural burn. They assess risks commonly associated with low risk cultural burning. Their application prescribes controls to minimize the risks commonly associated with low risk cultural burns. They are intended to be used as checklists by burn planners, Incident Controllers and competent firefighters prior to, and during, low risk cultural burns.

The Incident Controller can only approve the commencement of a low risk cultural burn if each of the following requirements are met. The Incident Controller must check that expected and current fire conditions are at low risk level. These requirements are essentially 'go/no-go' criteria for burn planners and Incident Controllers.

Planning and Initiation

The general intent – A community, low risk, cultural burn is carried out by Aboriginal people with NPWS to care for country and culture. *To reduce the risk of compromising Aboriginal cultural values, assets, life and property, close cooperation between NPWS and the Aboriginal community is essential.* .

1. The Aboriginal community identifies the burn as having cultural value and propose their involvement in the burn. A pre and post fire cultural values assessment will be conducted or facilitated by the community liaison person. The Aboriginal community have representation in the planning, approval, implementation and assessment of the burn.
2. A type 2 burn plan is approved by the Regional Manager in ELEMENTS and ICON is used during the burn operation both as per FMM requirements.

- 3. The burn plan and its operation will not compromise the cultural safety of those attending. Cultural safety requirements will be identified in the cultural values assessment and burn plan.
- 4. Ignition strategy and tactics for the burn will not compromise cultural objectives.
- 5. Approval of both the Incident Controller and community liaison person is required before the burn is ignited.

Burn Prescriptions

The general intent – *To reduce the risk of inexperienced people being injured, weather, fuel and terrain conditions must create only a cool, very low intensity, slow moving, often patchwork burn that can be ignited and monitored on foot. The burn should only cover a relatively small area. The planned burn is expected to be self-extinguishing and last for only a short duration. It is expected to require minimal mop up and patrol.*

- 6. The predicted fire behavior is benign (flame length <1m, rate of spread < 200m/hr).
- 7. Conditions are benign (Wind < 15kph in the open, Wind direction is favorable to operations, Slope < 15 degrees along containment / ignition lines)
- 8. Fire Danger Index (FDI) will remain low or moderate (to a maximum of 12) for twice the expected duration of the burn.
- 9. The Fuel Load/Forest Fire Danger Index matrix below allows for burning

Check boxes

Fuel Load (t/ha)	Forest Fire Danger Index (FFDI)					
	2	4	6	8	10	12
5	allowed	allowed	allowed	allowed	allowed	allowed
10	allowed	allowed	allowed	allowed	allowed	disallowed
15	allowed	allowed	allowed	allowed	disallowed	disallowed
20	allowed	allowed	disallowed	disallowed	disallowed	disallowed

Modified from "Standards for low intensity bush fire hazard reduction burning (for private landholders) NSW RFS".

- 10. Overall Fuel Hazard (OFH) is high or lower
- 11. Vertical fuel structures do not allow laddering of fire into mid-storey or canopy
- 12. Visibility along control lines is good. Smoke, terrain, vegetation, structures, people or any other barrier will not obscure line of sight between competent firefighters and participants.

Supervision

The general intent – *To reduce the risk of inexperienced people being injured everyone attending the burn that does not meet standard FMM fire competencies are supervised by competent firefighters who will provide assistance and keep them safe.*

- 13. The number of competent firefighters assisting on the burn is enough to maintain visual contact with all participants and, if required, observers attending at all times.

14. Everyone attending the burn agrees to observe all directions of the Incident Controller and the competent firefighters assisting.
15. Everyone attending the burn receives a briefing that meets all requirements of the FMM, this Guide and the OEH Volunteer Policy and Procedures before they can be an observer or participant.
16. Everyone attending the burn must indicate they have understood initial briefings after which they will to be formally endorsed as volunteers.
17. Everyone will advise their supervising competent firefighter of their departure when they leave.

Fire Awareness and Safety

The general intent – *To reduce the risk of people being hurt everyone attending the burn will have a realistic awareness of the dangers involved in burn operations. This will ensure safe behavior, safe dress and care for the safety of others.*

18. Participants and observers will complete culturally appropriate fire awareness induction prior to burning. It is preferred if this is delivered as part of a site assessment or otherwise done before burn day. If FDI is expected to be moderate, fire awareness training must be provided before the day of ignition.
19. Participants and observers must always be in safe locations, under the direct sight and supervision of competent fire fighters.
20. All participants and observers agree that if risk increases or are expected to increase, then those people affected are obliged to move to a safe place under the direction of competent fire fighters until low risk levels return. Reasons for changes in risk levels include, but are not limited to,
 - Deteriorating conditions
 - Increased fire behavior,
 - Obscuring of sight lines between participants, observers and supervising competent firefighters,
 - Increase in the number of people attending beyond the capacity of the available competent firefighters to supervise,
 - Presence of participants or observers without the required PPE,
 - Dangerous or unsafe behavior by any people or person attending the fire
 - Failure of fire-fighting equipment
 - Presence of any other circumstance that compromises safety

Resourcing during burn operations

The general intent – *To reduce the risk of people being injured or property damaged if there is a temporary or unexpected change in risk level.*

21. The Incident Controller is to ensure there are sufficient resources and planning available to provide the required supervision for all the people attending and to both move some or all people attending to safe locations while containing the burn using FMM provisions.

Special requirements

The general intent – *All people attending will be provided with the supervision and support they need to keep them safe and to make the experience rewarding, so reducing the risk of injury or distress to them.*

Children - The presence of the children (people under 16) at a community, low risk cultural burn is recognized as important for intergenerational knowledge exchange and customary practice. Their participation in the activity may also have significant cultural meaning. However, caring for the safety of children requires special considerations.

22. Children cannot be participants if FDI >6

23. Children must be accompanied to the burn and be under the supervision of an adult at all times. An adult cannot supervise more than one child. This is in addition to requirements for supervision by a competent firefighter.

24. The adult who accompanied them to the burn will take responsibility for the safety and behavior of the child that they accompanied.

25. Children must meet the same requirements as adults, including PPE and cultural fire awareness induction and briefings.

People with Mobility or Comprehension deficits - Elderly and disabled people are important to the community, they may have much to give, and their difficulties with mobility or comprehension should not necessarily preclude them from attending a low risk cultural burn.

26. The community liaison officer will organize for suitable community support to be provided to people with mobility or comprehension problems.

Copied from Standards for low intensity bush fire hazard reduction burning (for private landholders), NSW Rural Fire Service

STEP 9. ENSURE PERSONAL SAFETY CONSIDERATIONS ARE IMPLEMENTED

Your safety, and the safety of others assisting you during any hazard reduction burning is of utmost importance. You should discuss personal safety issues with your local RFS.

Before lighting the burn, everyone involved should consider:

- ♦ Wear natural fabrics (e.g. cotton, denim or wool). Synthetic fabrics can melt or burn.
- ♦ A long-sleeved shirt made from thick cotton or wool is ideal to prevent burns to the upper body and arms (e.g. flannelette or cotton drill work shirt).
- ♦ Sturdy leather work boots along with a pair of woollen socks prevent burns to the feet.
- ♦ A pair of heavy cotton pants will shield your legs from the radiant heat emitted from the fire (e.g. denim jeans or oil-free overalls).
- ♦ By wearing a wide-brimmed hat you can stop embers from dropping onto your head or down the back of your shirt.
- ♦ Work gloves will protect your hands.
- ♦ A good pair of goggles will safeguard your eyes against any embers and debris that may be in the air.
- ♦ Cover your nose and mouth with a wet handkerchief or piece of cloth to prevent inhalation of smoke and embers.

