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10 September 2025

Your ref: CCC-1190864-B0T5V1 DCCD:0325000001565

Dear Mr Turner,

**Escalation of our concern: local evidence of rare and threatened species in planned burn areas around Lorne**

Planned burn strategies require constant evaluation and adaptation in order to fulfil DEECA's commitment not just to avert fire disasters, but to protect and conserve rare and threatened species.

On 12 May 2025 we wrote providing local evidence of Otway Smooth Frog, Otway Snail and Yellow-bellied Glider populations in Lorne. The frog evidence included a recording (submitted by Sheryl Lewis) and the glider evidence included a video with geolocation details (in an accompanying submission by Dr Mary Lush). We wrote in good faith, in the full understanding that the science of protecting species and maintaining the diversity of our ecosystem rests heavily, worldwide, on citizen-provided evidence.

We asked the following questions about DEECA's assessment and management plans:

What areas do ecologists estimate are needed to sustain current populations of Otway Smooth Frogs, Yellow Bellied Gliders and Otway Snails?

What is the extent of habitat loss associated with planned burns over the next 20 years? In the asset protection zone, we understand there will be 3-4 burns over this time period.

What monitoring does FFMV have in place to assess the effects of burns carried out in 2024 and already in 2025 that will be relevant to the species considered here?

Chris Hardman replied on 3 September 2025, referring all subsequent correspondence to you.

He did not answer any of our questions. Or comment on our evidence. Nor say that he would act to verify it. Three quarters of the long reply simply put the general case for fuel management practices, pointing out numerous resources and policies that have no immediate bearing on the matter at hand. He then quoted the Victorian Biodiversity Atlas as one of the tools that DEECA uses to plan your burns. If this was indeed the case, then DEECA would already consider the yellow-bellied gliders in Lorne as potentially extinct because there has been only three records of yellow-bellied gliders listed there since 2010.

The situation is urgent in our view. That is, it seems that planned burns will proceed in Lorne with insufficient information about the rare and threatened species in their path. I refer particularly to the Garvey Track to Sharps Road and Hendersons Track areas where we have documented the three species.

With respect to the yellow-bellied gliders, for example, this is our understanding of the risk. Under the Environment Protection and Biodiversity Conservation Act prescribed burns are considered a threat.[1] The 2022 Conservation Advice for *Petaurus australis australis* (yellow-bellied glider, south-eastern) references the findings published by DELWP in 2016 that “*trees burnt by planned burns were 28 times more likely to collapse than unburnt trees*”. [2]

In the section on conservation and management priorities, under the sub-heading Habitat Loss, Disturbance and Modifications (including Fire), the second paragraph of the 2022 Conservation Advice for *Petaurus australis australis* (yellow-bellied glider, south-eastern) states, ‘*Avoid planned burns, clearing, timber harvesting or other disturbance in a 65 ha zone around habitat which has been burnt in the past 10 years.*’ (p.18)

The most recent review of yellow-bellied gliders [3] does not refute the suggestion of the 2022 Conservation Advice about prescribed burns.[1] Recent Victorian work on the species includes that by Whisson et al. [4] Note these authors use a monitoring technique which Dr Lush suggested in her submission. If you are aware of any more recent work on yellow-bellied gliders, particularly in the Otways, we would like to learn of it please.

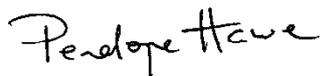
It may be that the answers to our questions might be better sourced by the biodiversity management sections of DEECA, rather than bushfire and forest services. Perhaps that is what caused the delay in replying to us. But it still leaves the question, if DEECA acknowledges that yellow-bellied gliders and/or other rare and threatened species are present, what steps are you taking to meet the conservation and management responsibilities outlined by the science above? More particularly, how *exactly* are the fire management practices adjusting to the presence of rare and threatened species?

Finally, we restate the sentiment expressed in our first letter. We respect your responsibilities. We also know that DEECA has a commitment to partner with the public to accomplish your entire portfolio, be that fire safety or conservation. When we supplied data and evidence to you, we expected to be treated promptly and to be taken seriously. When we asked specific

evidence-informed questions, it is manifestly inadequate to simply reply that “mitigations are developed and implemented with the advice from biodiversity experts”.

Especially in times of fiscal constraint public servants should look to communities as resources for intelligence gathering and collaboration. After all, every year 2.3 million volunteers like us collect data within thousands of biodiversity research projects worldwide. Our time alone is estimated to be worth as much as \$2.5b(US) annually.[5] So, when we raise the alarm about a local situation, which we know because we may be in parts of the forest more often than your teams, we feel you should pay attention.

Yours sincerely,



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1. Conservation Advice for *Petaurus australis australis* (yellow-bellied glider (south-eastern)) Dept of Agriculture, Water and Environment. Commonwealth of Australia 2022 (<https://www.environment.gov.au/biodiversity/threatened/species/pubs/87600-conservation-advice-02032022.pdf>)
2. Bluff L (2016) Reducing the effect of planned burns on hollow-bearing trees. Department of Environment, Land, Water and Planning (Vic), Melbourne.
3. Goldingay, Ross L. “A Review of the Ecology and Conservation of the Yellow-Bellied Glider.” *Australian Mammalogy* 47, no. 1 (2025). <https://doi.org/10.1071/AM24041>
5. Whisson, Desley A., Freya McKinnon, Matthew Lefoe, and Anthony R. Rendall. “Passive Acoustic Monitoring for Detecting the Yellow-Bellied Glider, a Highly Vocal Arboreal Marsupial.” *PLOS ONE* 16, no. 5 (2021): e0252092. <https://doi.org/10.1371/journal.pone.0252092>
5. Theobald, E., Ettinger, A., Burgess, H., DeBey, L., Schmidt, N., Froehlich, H., & Harsch, M. (2015). Global change and local solutions: Tapping the unrealised potential of citizen science for biodiversity research. *Biological Conservation*, 181, 236–244. [doi:10.1016/j.biocon.2014.10.021](https://doi.org/10.1016/j.biocon.2014.10.021)