



Australian Government

National Emergency
Management Agency

Submission to the Independent Review of Commonwealth Disaster Funding

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Consent option: Publish with name

Submitted by: Independent Bushfire Group

Q1. What experience have you had with Commonwealth disaster funding support?

(NB: This submission relates primarily to funding support for bushfire events and bushfire management, with particular reference to the response phase of bushfire suppression. Our submission does not fit easily into the available "5-question" format so all sections of this submission should be considered together.)

Members of IBG have been involved in managing major bushfires (often "Section 44" fires in NSW), some of us in leadership roles such as Incident Controller. So we have also been involved in large expenditures and in processes to claim Commonwealth disaster funding.

Recently we have examined the suppression of the Black Summer fires in 2019-2020 in NSW. Through extensive research and consultation we have identified a number of issues which impact the cost and effectiveness of suppression operations.

Q2. How could Commonwealth funding support communities to reduce their disaster risk?

The system (DRFA 2018) for funding of Category B Counter Disaster Operations appears to lack performance criteria or assurance requirements for Bushfire. This stands in contrast to Reconstruction funding which requires Independent Technical Review and Assurance. Also, the DRFA has no identified role in promoting improved disaster readiness (planning and preparation) to reduce the costs of response and recovery. This is comparable to funding 'the ambulance'.

There is always room for improvement in bushfire suppression operations. IBG has researched and documented issues from the 2019-2020 NSW bushfires (see Q5) and identified the following main concerns impacting the cost and effectiveness of suppression operations:

1. Insufficient initial attack on some remote fires, which then grew large and damaging (e.g. Green Wattle Creek Fire, Gospers Mountain Fire, ref. IBG, see Q5).
2. Strategies that expanded fires and increased community impact (e.g. backburns at Mt Wilson and Balmoral, ref. NSW Bushfire Inquiry).
3. Inefficiency of some Incident Management components (e.g. Divisional Command, ref. IBG reports, see Q5).





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4. Poor efficiency in deployment of some aircraft, notably Large Air Tankers (e.g. Royal Commission into National Natural Disaster Arrangements, and Investigating the suitability of aviation tracking data for use in bushfire suppression research, BNHCRC 2022).
5. Inadequate post-fire review to learn lessons (see IBG paper Q5).
6. Inadequate Local Government attention to disaster risk evaluation and subsequent planning, preparation, response and recovery.

These issues led to increased damage to lives, communities, property, infrastructure and environment, and thus avoidable cost to the Commonwealth via DRFA. We expect the NSW DRFA claim against 2019-2020 bushfires may be in the hundreds of millions of dollars, yet there was no Commonwealth control or assurance on how well this money was spent.

The basic cause of this situation is the lack of an effective learning culture for bushfire operations in NSW. This is notwithstanding the various Lessons Management frameworks and guidelines that exist both nationally and in NSW, because they have not yet been applied to deliver robust lessons outcomes. The public inquiries paid minimal attention to bushfire operations, effectiveness and costs (see Q5 re IBG paper Learning from past fire operations for future success).

Without change, the Commonwealth will again be exposed when major fires return to NSW, perhaps in the coming season. The Commonwealth needs assurance that its funding is promoting more effective disaster response to reduce risk to communities.

Performance criteria can be applied to the full range of eligible bushfire activities, from initial attack to recovery. We urge the simplest and most effective solution to ensure reduced risk to communities, within the powers of the Commonwealth, would be to tie disaster funding to independent oversight of bushfire (disaster) learning and reviews. The creation of a well-constructed Inspector General of Emergency Management (IGEM) in NSW, as established in Victoria and Queensland, would be a suitable assurance mechanism (noting that the established IGEMs are imperfect). The Commonwealth (e.g. NEMA) could also establish a process to evaluate the performance of IGEMs as part of its arrangements with the states.

Q3. Please describe your understanding of Commonwealth disaster funding processes.

We have a broad understanding of Commonwealth disaster funding processes in relation to bushfires. Under the Disaster Recovery Funding Arrangements 2018 (DRFA), NSW and other states can apply for funding from the Commonwealth when certain thresholds for state disaster expenditure have been exceeded. Bushfire suppression comes under Category B of Guideline 2 – Counter disaster operations, which identifies the following eligible activities:

- * fire suppression activities to protect the general public
- * construction of fire breaks or other fire containment activities to protect the general public, and
- * aerial firefighting in the immediate proximity of a community where fire impact is imminent

(e.g. 'Emergency Warnings' are being issued to the community because the fire could impact a residential area within six (6) hours).





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(Attachment A to the Guideline applies to aerial firefighting).

These categories would seem to cover, in effect, most bushfire suppression activities. It is unclear why aerial firefighting close to communities is distinguished as a separate activity since it also falls within the first two items.

"Protect the general public" is too narrow a criterion, since infrastructure and environment are other critical assets which are protected by bushfire suppression. The Objects of the NSW Rural Fires Act 1997 include the protection of "persons from injury or death", "property from damage" and "infrastructure and environmental, economic, cultural, agricultural and community assets". Suppression activities are usually directed at protecting all these asset classes, often simultaneously. Commonwealth funding assistance should not be limited to "the general public" criterion.

Regarding environment, the Commonwealth has legislative responsibilities to protect nationally listed threatened species, National Heritage places and World Heritage places. Bushfire is an established threat to these environmental assets. IBG analysis shows that bushfire suppression often causes unnecessary impact to environmental values. These facts should be recognised by applying environmental protection criteria to Commonwealth funding for bushfire disasters. Effective lessons management systems and an IGEM would also address this issue.

Q4. Are the funding roles of the Commonwealth, states and territories, and local government, during disaster events clear?

No. The roles of each level of government need to be clearly agreed, delineated and described to the public in plain terms, in one place.

Commonwealth DRFA funding is currently limited to response and recovery, but there is potential to use disaster funding to promote increased resilience by the states, that is, to improve planning and preparation for disasters, and hence reduce the overall risk to communities, while also promoting improvement in response and recovery.

Q5. Is there any further information you would like to provide?

Please refer to IBG's website for documentation in support of this submission:

<https://independentbushfiregroup.org/>

On our Reports page (<https://independentbushfiregroup.org/reports/>) you will find:

- * IBG's major report: Reducing the costs and impacts of bushfires.
- * A summary report of above.
- * 11 bushfire cases studies.
- * IBG proposal for an IGEM in NSW.
- * A paper on "Learning from past fire operations for future success".

