

FESA Submission to the Perth Hills Bushfire February 2011 Review



Executive Summary



Government of Western Australia
Fire & Emergency Services Authority





Government of **Western Australia**
Fire & Emergency Services Authority



Mr Mick Keelty APM
Perth Hills Bushfire February 2011 Review
Locked Bag 10
Cloisters Square
PERTH WA 6850

Dear Mr Keelty

FESA SUBMISSION – PERTH HILLS BUSHFIRE FEBRUARY 2011 REVIEW

I refer to your correspondence dated 2 March 2011 providing an opportunity for individuals and organisations to make a submission to the Review. FESA welcomes the Review and thanks you for your positive interaction with the organisation throughout the Review process.

I have much pleasure in providing you with both soft and hard copies of FESA's comprehensive submission to the Review for your consideration. This submission is supplementary to the information provided to you at the hearing conducted with FESA representatives on 21 March 2011 and the subsequent presentation to you on 12 April 2011.

Appreciating and addressing your specific Terms of Reference, FESA has taken a holistic approach to the issue of bushfire management within the State and has sought to address this within its submission. The submission contains a standalone Executive Summary and a comprehensive and detailed supporting submission with relevant appendices.

I trust you find the submission both comprehensive enough to espouse FESA's position on these matters and also useful in determining the outcomes of the Review and the subsequent report to Government.

As indicated to you on 21 March 2011, I commence leave this afternoon and request that should you have any further queries regarding this matter please do not hesitate to contact Acting Chief Executive Officer Frank Pasquale at this office.

Yours sincerely

JO HARRISON-WARD
CHIEF EXECUTIVE OFFICER

15 April 2011

TABLE OF CONTENTS

1.	FESA’s approach to this submission.....	4
2.	Structure of Submission.....	5
3.	Background.....	8
4.	Leading into the Fires.....	13
5.	FESA Submissions.....	15
5.3	Theme 1 Structural Reform to achieve a seamless and integrated “Bushfire Safe – WA”.	17
5.3.1	EXISTING PROGRAMS.....	17
5.3.2	NOMINATION OF A SINGLE AGENCY RESPONSIBLE FOR BUSHFIRE MANAGEMENT WITHIN WA.....	22
5.4	Theme 2 Strategic Capability Building.....	26
5.4.1	DEVELOPMENT OF A SINGLE STATE CAPABILITY MODEL.....	26
5.4.2	WHOLE-OF-GOVERNMENT RESOURCE COORDINATION SYSTEM.....	28
5.5	Theme 3 Community Fire Safety Planning.....	30
5.5.1	BUILDING AN ACTIVE AND ENGAGED FIRE SAFE COMMUNITY.....	30
5.5.2	PLANNING AND CONSTRUCTION IN BUSHFIRE PRONE AREAS.....	35
5.5.3	EMBEDDING THE “PRIMACY OF LIFE” PRINCIPLE.....	39
5.5.4	EVOLUTION OF BUSHFIRE PLANNING INTO TOWNSHIP PROTECTION/COMMUNITY LEVEL PLANS.....	40
5.6	Theme 4 Unified Control.....	44
5.6.1	Integration OF AGENCIES WITHIN A SINGLE STATE OPERATIONS CENTRE.....	44
6.	Summary.....	50
7.	Actions Arising – Hearing with REVIEW on 29 March 2011.....	51
8.	Summary of FESA Recommendations.....	54

PREFACE

In response to the bushfires in the Perth Hills on 5 and 6 February 2011, when 71 homes were destroyed and a further 39 homes and other structures were damaged, the Premier of Western Australia announced an inquiry into the fires on 23 February 2011. The inquiry, to be known as the *Perth Hills Bushfire February 2011 Review*, will be undertaken by Mr. Mick Keelty APM in accordance with s 24H of the *Public Sector Management Act 1994*.

The review is in addition to the Fire and Emergency Services Authority (FESA) major incident review being conducted by Mr. Stuart Ellis AM. The *Perth Hills Bushfire February 2011 Review* will seek to address all aspects of bushfire risk management in the Perth Hills area, with specific reference to the following terms of reference established for this review:

1. The adequacy of current preventative measures, specifically prescribed burning and other bushfire mitigation activities.
2. The impact of land use, environmental and building laws, practices and policies in the affected areas, affecting bushfire prevention, mitigation and response and what, if any, changes may be required.
3. The actions that can and should be taken by landowners, residents and tenants in relation to bushfire risk management including undertaking vegetation clearance, operation of evaporative air-conditioners and storage and/or removal of hazardous inflammable material surrounding their dwellings and buildings. This should include consideration of associated enforcement regimes and penalties.
4. The adequacy and effectiveness of information and communication campaigns and mechanisms, including systems for alerting residents in relation to the fire and potential fires.
5. Improvements that can be made in relation to the coordination of activities across all levels of government, including with volunteer groups.

Mr. Keelty is required to submit his report to the Premier within four months, and the report will be tabled in Parliament and released publicly.

This submission responds to and addresses all of the above terms of reference and extends to a more holistic approach to bushfire management within Western Australia (WA). FESA welcomes the opportunity to make this submission and will work in partnership with the Inquiry to achieve the best possible result for the community of WA.

1. FESA'S APPROACH TO THIS SUBMISSION

Immediately following the *Perth Hills Fires* and prior to the announcement of the *Perth Hills Bushfire February 2011 Review* by the Premier, FESA engaged Mr. Stuart Ellis to undertake an extensive *Major Incident Review* into the specific circumstance of the preparedness for, and response to, these devastating fires. This proactive approach is consistent with FESA's commitment to continuous improvement and learning from these types of major incidents to enhance and inform its future service delivery and protection of the WA community.

In addition FESA has continued to undertake its own normal debriefing procedures for the Lake Clifton (Dorsett Road), Red Hill and Roleystone fires which will be used as a key input into the umbrella Major Incident Review process being conducted independently by Mr. Ellis.

Whilst the *Perth Hills Bushfire February 2011 Review* terms of reference are understandably quite specific to the Perth Hills area, FESA believes the underpinning issues cannot be separated, and should be considered in the context of, the broader State arrangements applicable to bushfire management.

On this basis, in preparing this submission FESA has taken a very holistic view, and whilst addressing the specific terms of reference, has also examined areas for improvement both within and beyond its control. This has involved extensive analysis of a range of issues and multiple sources including the specific lessons learnt from the *Perth Hills Fires*, other inquiries (including Commonwealth, WA, Interstate and the recent *Victorian Bushfires Royal Commission*), FESA's own structures, policies and procedures and its interrelationship with partner agencies in managing bushfires within WA.

Whilst this submission contains a critical review of a range of holistic issues, it should not be construed as direct criticism of any particular individual or agency's performance. FESA strongly believes that without taking a holistic and forward looking view of these issues and removing existing norms from consideration, the ultimate best outcome for the community of WA will not be achieved. It is on this basis and FESA's strive for best practice, this submission has been drafted in the overall public interest.

2. STRUCTURE OF SUBMISSION

2.1 Overview

The structure of FESA's full submission is aimed specifically to address the following:

- Provide a general overview of the State's bushfire management arrangements;
- Provide a general overview of FESA and its related bushfire management activities/initiatives;
- Address the Review's Terms of Reference; and
- Provide proposals for change to enhance the State's approach to bushfire management.

The success or otherwise of bushfire management within WA relies heavily on a combination of *structure* and *systems* approach and to examine parts of the system for one specific fire or geographic area will not result in the level of scrutiny and/or opportunities for improvement that FESA submits is necessary for the achievement of *best practice* bushfire management across WA.

Accordingly, FESA has developed this comprehensive submission according to these principles and encourages the Inquiry to also share a more holistic approach to the issues before it.

2.2 Alignment to Terms of Reference

The submission specifically addresses the Terms of Reference of the Inquiry. The following table provides a quick reference guide to this alignment, against the table of contents for the full detailed submission. In this manner the Inquiry should be able to solicit both generic and holistic information and also information specific to its specific Term of Reference.

Table 1 – FESA Submission Alignment to Review Terms of Reference

SECTION NUMBER	SECTION TITLE	TERMS OF REFERENCE
1	STRATEGIC OVERVIEW	
1.1	FESA	1-5
1.2	WA Emergency Management Arrangements	5
1.3	FESA as a Statutory Authority	3
1.4	2010/11 Fire Season	
1.4.1	Seasonal Prognosis	1,4
1.4.2	Additional Preparedness Commensurate with Prognosis	1,4
1.5	Perth Hills Fires	
1.5.1	Overview	3,5
1.5.2	Public Information	4
1.6	Previous Inquiries	
1.6.1	Overview	1-5
1.6.2	Victorian Bushfires Royal Commission	1-5
2	THEME 1 – STRUCTURAL REFORM TO ACHIEVE A SEAMLESS AND INTEGRATED BUSHFIRE SAFE – WA	
2.1	Nomination of a single agency responsible for bushfire management within WA	1-5
2.2	Single bushfire management, policy, planning, systems and mitigation activities	1-5
2.3	Clear lines of accountability (and removal of duplication) within bushfire planning, prevention, mitigation, preparedness and response activities	1-5
2.4	Management of Unallocated Crown Lands (UCL) and Unmanaged Reserves (UMR)	1
3	THEME 2 – STRATEGIC CAPABILITY BUILDING	
3.1	Statewide capability model	5
3.2	Whole-of-Government resource coordination system	5
3.3	Structured recognition and use of local knowledge and structured incident management accreditation system	5
3.4	Enhancing Volunteerism	5
4	THEME 3 – COMMUNITY FIRE SAFETY PLANNING	
4.1	Building engaged and active Fire Safe Communities	3,4
4.2	Fire Hydrant Ownership	2
4.3	Planning and construction in bushfire prone areas	2
4.4	Critical water infrastructure protection	3
4.5	Clearer understanding and promotion / acceptance of the “primacy of life” in state fire control priorities and mitigation planning/works	1-3
4.6	Evolution of existing bushfire planning systems to more localised township protection/ community level plans	1,2
4.7	Bushfire Risk Management in Indigenous Communities	1
4.8	Prescribed Burning / FESA Integrated Bushfire Risk Management System (IBRMS)	1
5	THEME 4 – UNIFIED CONTROL FOR BUSHFIRES	
5.1	Integration of agencies within a single State Operations Centre	5
5.2	Strategic intelligence management, including public information and use of social media	4
5.3	Clarity in definition around command, control and coordination	5
5.4	Access to incident ground	5

2.3 FESA Recommendations

Throughout the content of FESA's Submission, it has outlined a series of proposals which form the basis of its recommendations to the Review against each sections subject matter. A consolidated list of all FESA Recommendations is attached as Section 8 of this Executive Summary cross referenced to the respective section of the submission where applicable.

3. BACKGROUND

At the outset of any consideration of bushfire management arrangements within WA, it is important to recognise that the cornerstone of these arrangements rely almost exclusively on volunteers, Bush Fire Brigades and Local Government. The tireless commitment and efforts of these key parties is to be commended and continues to be the underlying basis upon which FESA aims to evolve its core development and support programs, without which the State's arrangements would not be as effective as they presently are. The volunteer ethos that underpins FESA and the State's emergency management arrangements should not be lost throughout the considerations of this Review, and should be read to underpin all elements of FESA's submission.

Since its inception in 1999, FESA has continued to evolve its unique community centered and integrated "umbrella" operating model, built upon strong leadership and an inclusive and supportive approach to staff, volunteers and Local Government. It has also sought to establish enduring relationships with the Department of Environment and Conservation (DEC) as a key partner in bushfire management, with what it accepts has delivered mixed success. FESA remains totally committed to evolving a more inclusive, open and integrated operating environment with all parties involved in bushfire management from what has been achieved in the past.

FESA is very proud of its achievements over its very short life as an integrated organisation and strongly believes it has the right organisational approach for the effective and efficient management of fires and emergencies within WA. The success of the FESA model is clearly demonstrated in the achievements outlined in the *State of the Service* document attached as Appendix 1 of this submission.

FESA is the only totally integrated fire and emergency services organisation within Australasia and strongly believes it harnesses the collective energy, expertise and opportunity to administer fire and emergency service capability and capacity within the State. It provides a consistent, community centered and supportive organisational environment for staff, volunteers, Local Government and key partners to operate within.

FESA believes it is now time to take the next step change in the evolution of bushfire management through a single integrated approach to managing this enduring hazard within WA.

Cognisant of improvements recommended in numerous external reviews and inquiries, both intra- and inter-state, particularly regarding the need for greater clarity and line of sight accountability and control for bushfire management, FESA believes the State's arrangements have now matured to a point where further improvements and the next step can be facilitated.

The Interagency Bushfire Management Committee (IBMC) established by the Minister for Emergency Services in 2009 has been a major step forward in improving interagency communication and cooperation. Chaired by FESA and involving senior representation from FESA, DEC, Local Government and the Bush Fire Service Consultative Committee, the IBMC has established 5 sub-committees encompassing; Fire Operations; Research; Fuel Load Management; Training and Aerial Suppression. This committee structure was instrumental in the implementation of key operational recommendations arising from the *Victorian Bushfires Royal Commission* and other important initiatives for bushfire management.

Whilst this approach has significantly improved a more collaborative approach, FESA believes this should now be more fully incorporated through a suite of initiatives outlined in its full submission to the Inquiry and briefly detailed below. These include needed structural reform to facilitate the necessary improvements, without diminishing the relevance and/or important role that all key stakeholders play within their respective responsibilities for bushfire management within WA.

Other more recent considerations that should also underpin the outcomes of this Inquiry with respect to structural reform is the findings and suite of recommendations of the *Community Development and Justice Standing Committee* contained in its report to the Legislative Assembly on 19 October 2006 which were subsequently approved by Cabinet and are now being implemented. These include such matters as:

Recommendation 55

The emergency services legislation is to provide for FESA and Local Government to enter into an agreement for the purpose of Local Government transferring the following responsibilities to FESA on a permanent basis:

- *emergency incident control;*
- *Bushfire Brigade operations and administration; and the*
- *Determination and administration of the ESL, in relation to the capital and recurring costs associated with the Bushfire Brigades.*

Recommendation 57

Local Government is to retain emergency prevention functions as prescribed under the existing legislation

In essence the above was recognition of the current complex operating environment which operates across the fire service jurisdiction within WA, which is in effect a combination of approximately 124 individual fire authorities consisting of 122 local governments (with Bush Fire Brigades), FESA and DEC. These provisions which will be included in the new consolidated *emergency services legislation* (title and make-up currently being refined through a specific standalone project) which will provide a mechanism to facilitate a more streamlined structural arrangement through a collaborative approach between Local Government and FESA. It is also opportunistic to integrate any legislative requirements which may generate through this Review into this project.

The following provides a snapshot of FESA's responsibilities, size and demographics:

FESA has a diverse range of functions. These include, but are not limited to managing the following hazards:

- Fire (controlling agency)
- Injury or threat to life of persons trapped by the collapse of a structure or landform
- Cyclone
- Earthquake
- Flood
- Storm

- Tsunami
- Actual or impending spillage, release or escape of a chemical , radiological or other substance that is capable of causing loss of life, injury to a person or damage to the health of a person, property or the environment.

In addition, FESA provides combat and support services:

- Marine searches and rescues
- Land searches
- Air searches and rescues (including emergency casualty transport)
- Urban search and rescues
- Cliff, cave and confined space rescues
- Road transport emergencies
- Rail transport emergencies
- Animal disease outbreaks
- Resupply to Isolated communities
- Emergency Management

Through this integrated approach to planning and the adoption of a partnership philosophy, FESA continues to provide efficient and effective services to the community, via the dedicated support and involvement of 1,200 staff and over 30,000 volunteers who are all highly committed to the safety of the WA community.

The following tables outline the extensive volunteer structure and demographics of FESA, which in themselves provide an overview of the significant capacity of FESA as an organisation:

Table 2 – Volunteer Demographics

Volunteers	Number of Brigades, Groups or Units	Volunteer Numbers as at 30 June 2010		
		Operational	Support	Total
Volunteer Bush Fire Service	593	25,593	599	26,192
Volunteer Fire and Rescue Service	88	2,056	194	2,250
State Emergency Service	65	1,898	16	1,914
Volunteer Marine Rescue Service	33	1,336	24	1,360
Volunteer Emergency Service	16	541	1	542
Volunteer Fire Service	9	353	6	359

FESA Education and Heritage Centre	1	0	18	18
Total		31,777	858	32,635

Cadets and Juniors as at 30 June 2010	
Emergency Services Cadets	1,380
Juniors registered with brigades, groups and units	538
Total cadets and juniors	1,918
Emergency Services Cadet (ESC) Units	43
Junior Cadet Programs	79

[FESA Annual Report 2009/10]

This resource base and unparalleled organisational infrastructure results in FESA being the only agency capable, and with the capacity, to be the lead agency for overall bushfire management within the State. Moreover, FESA has no vested interest, perceived conflict or pecuniary interest in taking on this lead bushfire management role within the State as it remains totally independent of any land management or land ownership obligations, whether they be private or public land ownership/management.

This was identified as an issue in the recent *Review of the Ability of the Department of Environment and Conservation to Manage Major Fires* whereby the following comments were prominent throughout the report:

Land use and landscape fire management policy is increasingly complex. Balancing between the competing demands of good fire management on one hand, versus biodiversity conservation on another, and the needs of development on the other, create ongoing tensions

The responsibilities of landholders – including public land owners – for fire management is fundamental. If you own the fuel, you own the fire and so you share the responsibility for fire management.¹

FESA believes that unless a clear separation exists between those charged with making the ultimate decisions on how bushfire management occurs, including control during times of fire emergencies, then the potential for ongoing criticism will continue to exist. This includes potential criticism such as that sighted in the same report as follows:

¹ Ferguson 2010: p.6

WA Police (WAPol) draws attention to a “perceived preference for management of fire as opposed to mitigating the risk of fire continuation by fire suppression at the earliest convenience.”²

The WA Farmers Federation makes the following points in regard to bushfire suppression by DEC:

- ...
- *That there is “reluctance by state agencies to aggressively attack bushfires when they first start”.*³

FESA recognises the difficult dilemma faced by DEC in particular, as a land manager and having fire suppression responsibilities on public land. FESA is committed to work collaboratively with DEC to achieve the best outcome for the WA community. The role of a public land manager is extremely complex and challenging and nothing in this submission is an attempt to “take-over” this responsibility on public land, recognising that fire management is a fundamental and vital component of public land management and will continue to be. FESA also recognises that this requires a unique suite of skills and capacity in public land managers that it does not necessarily possess, and which it doesn’t want to.

However FESA believes it is now time to truly enhance the relationship and interaction between the organisations so they continue to coexist but in a much more integrated manner than has occurred in the past. To date this has relied on individual relationships and this has had incremental success, however it must now be more formalised in a *structural* and *systemic* manner for the future sustainability of a *Bushfire Safe – WA*.

A fundamental component of FESA’s activities is the community centered nature of the organisation and how it delivers its services through an extensive network of staff and volunteers operating within, and as part of, the community. This service delivery model provides the necessary diversity, skills and experience to deliver fire and emergency services across the State. The model also provides the necessary *surge capacity* to combat major incidents from an *integrated* and *all hazards* perspective. It has sufficient infrastructure and most importantly statewide *reach* into all communities through its regionally based service delivery model to adequately fulfil the task of being the bushfire management authority for the State.

FESA believes *Structural Reform* and a range of other initiatives is now necessary to *achieve a seamless and integrated “Bushfire Safe – WA”*.

² Ferguson 2010: p.13

³ Ferguson 2010: p.14

4. LEADING INTO THE FIRES

Leading into the 2010/11 summer fire season, southern WA was forecast to experience significant fire weather, a result of considerable drought conditions that have existed across most of Australia for several years, and which left it vulnerable to increased fire activity and risk. This resulted in an increase in vulnerability of fire activity and placed a significant demand on FESA and firefighters across the State.

The most significant of the fires experienced was the *Perth Hills Fires* which occurred on 5-6 February 2011 occurring in elevated fire weather conditions. These fires occurred in the City of Armadale and within a *Gazetted Fire District*⁴, which resulted in FESA being the control agency. At the time of origin of the *Roleystone Fire* which caused significant damage to houses and other structures, FESA was also managing the *Red Hill Fire* which originated on 5 February 2011. Both of these fires involved a multi-agency approach and resourcing, including FESA, Local Government and DEC.

The *Roleystone Fire* presented a range of challenges to FESA and attending crews. These included:

- Multiple incidents occurring simultaneously and associated resource demands;
- Severe weather conditions;
- Escarpment type terrain and associated accessibility issues;
- Rapid fire development;
- Building design and construction;
- Traffic management;
- Agency integration and coordination; and
- Intelligence gathering.

The *Roleystone Fire* also demonstrated a number of successes arising from recent reform within bushfire management activities. These included:

- The focus on *primacy of life* within the fire management strategy;
- Pre-planned escalated response on severe weather days;
- Community warnings and alert;
- Declaration of Total Fire Bans;
- Increased pre-planned preparedness levels;
- Coordination of resources;
- Legislative amendments regarding control;
- Community behaviour and cooperation;
- Local Government integration with FESA;
- Community information processes (including community briefings);
- Media Management; and
- Use of aircraft.

⁴ Gazetted Fire Districts originate from s 5 of Fire Brigades Act 1942.

Whilst this fire resulted in the unfortunate loss of 72 homes and damage to a further 37 other structures, most importantly; there were no lives lost. Given that approximately 598 houses were within the fire area, as opposed to the final fire perimeter, and subject to ember attack and were saved by either firefighting and/or personal efforts, the firefighting efforts should be considered successful.

The serious injury to one firefighter was extremely unfortunate and should not be lost in this analysis, however having regard for the total numbers of firefighters and other support personnel working within the fire area and the rapid onset and significant fire behaviour experienced, the overall safety management of personnel should also be considered successful.

However, FESA submits that there are a number of existing *structural* and *systemic* issues that impede significant improvements in bushfire management across the State and require further enhancement. Until these are addressed FESA believes such improvements in an *integrated and seamless statewide bushfire management system*, and consequential community safety outcomes, will not be achieved. As outlined in further detail within this submission, these issues involve taking a “*whole-of-system*” approach to:

- Integrated “tenure-blind” bushfire fire management policy, planning, systems and mitigation activities;
- Integrated statewide bushfire capability model;
- Single “integrated” *Incident Management and State Coordination*;
- Clear lines of accountability (and removal of duplication) within bushfire planning, prevention, mitigation, preparedness and response activities;
- Contemporary and sustainable community engagement strategy;
- Increased and meaningful coordination and support to Local Government, Bush Fire Brigades, Bushfire Control Officers, Staff and Volunteers;
- Two-way intelligence gathering, analysis and dissemination system (including the appropriate use of social media) at all levels of the bushfire management structure;
- Revised building standards and land-use planning framework commensurate with risk;
- Implementation of a structured whole-of-government resource coordination model;
- Clearer focus on an acceptance of the “primacy of life” in state fire control priorities and all mitigation planning/works;
- Increased recognition and use of “local knowledge” and experienced firefighters within all levels of the incident management structure rather than defaulting to “rank-based” or “organisational position-based” appointments;
- Clarity of use and definition between command, control and coordination within state emergency management arrangements; and
- Evolution of existing bushfire planning systems to more localised township protection plans that engage with, are understood, exercised and executed by the community and fire services at a local level.

5. FESA SUBMISSIONS

FESA submits that the lessons learnt from these fires underpinned by previous inquiries within WA and beyond, including the recent *Victorian Bushfires Royal Commission*; clearly support the need for WA to further reform the manner in which it administers an *integrated and seamless statewide bushfire management system*. It needs to be clearly understood that for the State to succeed with mitigating bushfire risk and enhancing the manner in which it manages this risk, it needs to accept that it is a total end-to-end system and each element of the system is interdependent on one another and cannot be separated or treated in isolation. This includes the division of accountability and responsibility within the system.

FESA also accepts and submits that bushfire risk can never be totally eliminated and constant attention needs to be placed on educating Government and the community of this fact in an attempt to make the community *active participants rather than passive recipients of services*, sharing the responsibility for mitigating and managing bushfire risk.

FESA is also committed to continuing to work in partnership with and supporting Local Government as the leader, key player and funder at a local level in bushfire management and with DEC for public land management activities, which includes fire management as a key component.

Accordingly, FESA submits the following key improvements should be considered as potential solutions to the issues identified in establishing a robust, sustainable and best practice statewide end-to-end bushfire management system. These improvements have been categorised into key themes with each having a number of sub-themes to achieve the overarching objective of each. The themes and sub-themes are listed below. The pertinent issues that FESA believe needs addressing is briefly outlined below with further evidence based supporting information relevant to these pertinent issues contained within its full detailed submission. Also, there are a number of the sub-themes that are only contained within the full detailed submission and do not form part of this Executive Summary.

In addition to the detail contained within this Executive Summary, the Review is strongly encouraged to consider all of the issues and supporting detail outlined in the full submission when considering their position on these matters.

5.1 Overarching principles

Notwithstanding the prefaced remarks outlined above as the fundamental basis of its submission, FESA strongly believes any considerations and outcomes of the Review should have regard for the following overarching principles:

1. The need to build upon existing structures and programs to support Local Government, Bushfire Mitigation and Community.
2. The need to facilitate an integrated approach to single line of control and accountability.
3. The need to empower the community and actively engage them in the planning processes and associated bushfire management arrangements for their local environment, commensurate with risk.

The applicability of these overarching principles to each FESA proposal is indicated below.

5.2 Proposed Improvements

The following provides an overview summary of the proposed suite of improvements FESA submits should be considered by the Review. It should be noted this is only an overview summary of the pertinent proposals with the detailed supporting analysis and inclusion of the more minor issues contained within its full submission.

5.3 THEME 1 STRUCTURAL REFORM TO ACHIEVE A SEAMLESS AND INTEGRATED “BUSHFIRE SAFE – WA”

The following components of this theme are outlined in detail within the full submission:

- Nomination of a single agency responsible for bushfire management within WA;
- Single bushfire management policy, planning, systems and mitigation activities;
- Clear lines of accountability; and
- Management of Unallocated Crown Land (UCL) and Unmanaged Reserves (UMR).

Desired Outcome:

Implementation of the proposals for improvement outlined in this theme will deliver an overarching single agency responsible to mandate bushfire management arrangements for the State, removing the reliance on relationships and collaboration, resulting in a more cohesive and accountable bushfire management structure with WA.

Linked to:

Overarching Principle 1

The need to build upon existing structures and programs to support Local Government, Bushfire Mitigation and Community

5.3.1 EXISTING PROGRAMS

FESA strongly submits that any structural reform options considered by the Review must not only have regard for these successful programs but also build upon them for the future. Any diminishment or division of these will be a fundamental step backwards and should not be considered, in line with this principle. The following provides an overview of the pertinent programs:

5.3.1.1 Bushfire Mitigation Program

In addition to its responsibilities as the HMA for bushfire response, FESA has undertaken significant work in establishing an integrated *Bushfire Mitigation Planning Model* which is focused clearly on engagement with Local Government, Bush Fire Control Officers, Bush Fire Brigades and other stakeholders to undertake a comprehensive analysis of local bushfire conditions. This model uses a scientifically backed methodology that undertakes a bushfire threat analysis which establishes the basis for a risk assessment and mitigation plan. This information is gathered by FESA Bushland Mitigation Officers working in partnership with regional staff, Local Government representatives, Fire Control Officers, local DEC staff and other stakeholders, and is recorded electronically in a ‘web based portal’ which is accessible to both FESA and Local Government.

This program, which was initiated by FESA in 2010, is already proving to be extremely successful and has elevated the level of sophistication around analysing, developing, executing, monitoring and reporting bushfire threat, risk and mitigation activities. The outputs of the model include spatial maps which can also be used as key inputs into operational response incident management, allowing decisions to be made based on factual data associated with fuel management and other mitigation activities undertaken at a local level.

This model has only been in operation for a short period of time but FESA has established an ambitious target that will see a combination of FESA Bushland Mitigation Officers being appointed into each region and a comprehensive mitigation plan developed for all very high and high bushfire risk municipalities by the end of 2011.

Unfortunately, this program is not formally integrated between FESA and DEC, which clearly demonstrates the need for formal structures to be established that result in an integrated plan, standards and systems to drive consistent bushfire management activities, based on the priority of *primacy of life*, whilst still having regard for other considerations including cultural heritage, indigenous sites and biodiversity interrelationships.

5.3.1.2 A True Partnership - Community Emergency Services Managers (CESM) Program

In addition to the above successful mitigation program, and as part of its overall operating philosophy, FESA prides itself on working collaboratively with and supporting Local Government, Bushfire Control Officers and Bush Fire Brigades. It achieves this through its diverse organisational structure and supporting infrastructure.

The recent introduction of the Community Emergency Services Managers (CESM) network which is a partnership between FESA and Local Government, including cost sharing arrangements, is a tangible success in this regard.

Administered through a MoU between FESA and individual local governments, this program is increasing in momentum and provides a key on-the-ground resource to support Bush Fire Brigade administration, maintenance and enhancement of local capacity, capability and stakeholder management. The key responsibilities of these positions are:

- Contributes to the strategic direction and management of volunteer fire services as part of the District Management Team and implements agreed programs within Local Government(s);
- Implements and supervises the delivery of preparedness, prevention, response and recovery services at an operational level within Local Government(s);
- Facilitates the mitigation of fire impact on the community through the coordination of a range of strategies in partnership with the community, Local Government(s) and Bush Fire Brigade volunteers; and
- Fosters effective and professional working relationships between FESA, Local Government(s), other agencies and stakeholders.

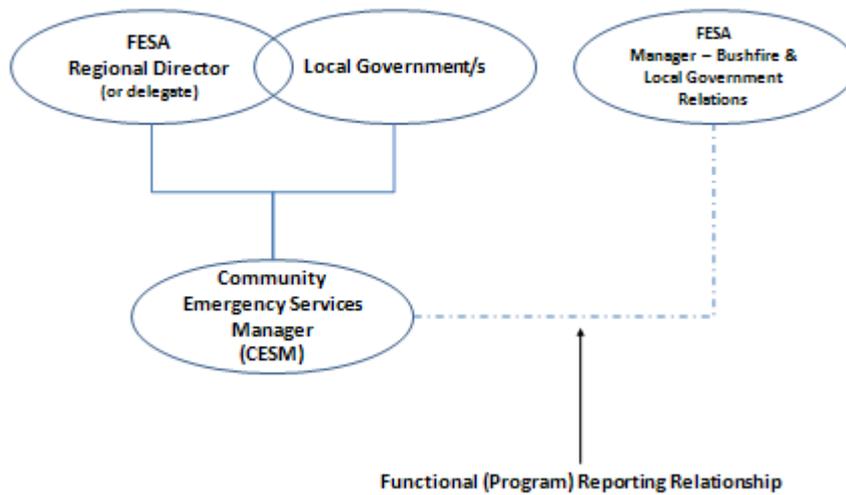
The program currently has 20 CESMs servicing 24 local governments across the state, with an expansion plan established. The reporting relationship for CESMs includes a line management

relationship between the regional FESA representative and Local Government, and a ‘functional’ reporting relationship to the FESA manager responsible for the program on a statewide basis. The business plan relevant to each CESM is also a jointly agreed plan between FESA and the Local Government, which is also included within the MoU arrangements applicable for these positions.

In recognition of the cost burden for the smaller remote / rural municipalities, the funding model was modified from an original straight 50/50 to a scalable funding split which is now based upon the ratable income of an individual Local Government.

The reporting relationship for CESM is outlined below.

Figure 1 – Community Emergency Services Manager (CESM) reporting relationships



The introduction of CESMs into the bushfire management system has been positively received by all parties involved. FESA has been very careful to maintain ownership and responsibility at the local level and as such has ensured that there is no duplication within roles, with clear synergies between the respective positions operating at that level. This is outlined below and becomes even more important when you consider the proposed future state of resourcing associated with achieving FESA’s corporate objectives with respect to the bushfire management system operating within WA.

The above arrangements are administered by a dedicated *Bushfire and Local Government Relations Branch* within the FESA structure, which provides program oversight of the interrelated programs as well as technical expertise across these important activities. It also means local governments have a 'one-stop-shop' to support them in these program areas and the FESA regional structures also integrate in the same way. This consolidated approach to managing these arrangements provides efficient and effective governance.

These changes and proactive initiatives also indicate FESA recognised more needed to be done in these areas, have sought resources and implemented a solution which has started to reduce the risk of bushfire in partnership with Local Government and the community. This should be recognised and supported by the Inquiry.

Case Study

The current arrangement whereby FESA has established a successful program to support Local Government in executing their range of responsibilities through the appointment of a co-funded Community Emergency Services Manager (CESM) provides an ideal balance between maintaining ownership at the local level and facilitating greater collaboration and expertise within the Local Government. This has been a very successful program and continues to incrementally grow across the State.

This approach will also facilitates the potential transition of Bush Fire Brigades administration and operational activities at the request of Local Government to FESA in a seamless manner in accordance with the legislative changes being implemented as a consequence of the Cabinet endorsed recommendations of the Community Development and Justice Standing Committee.

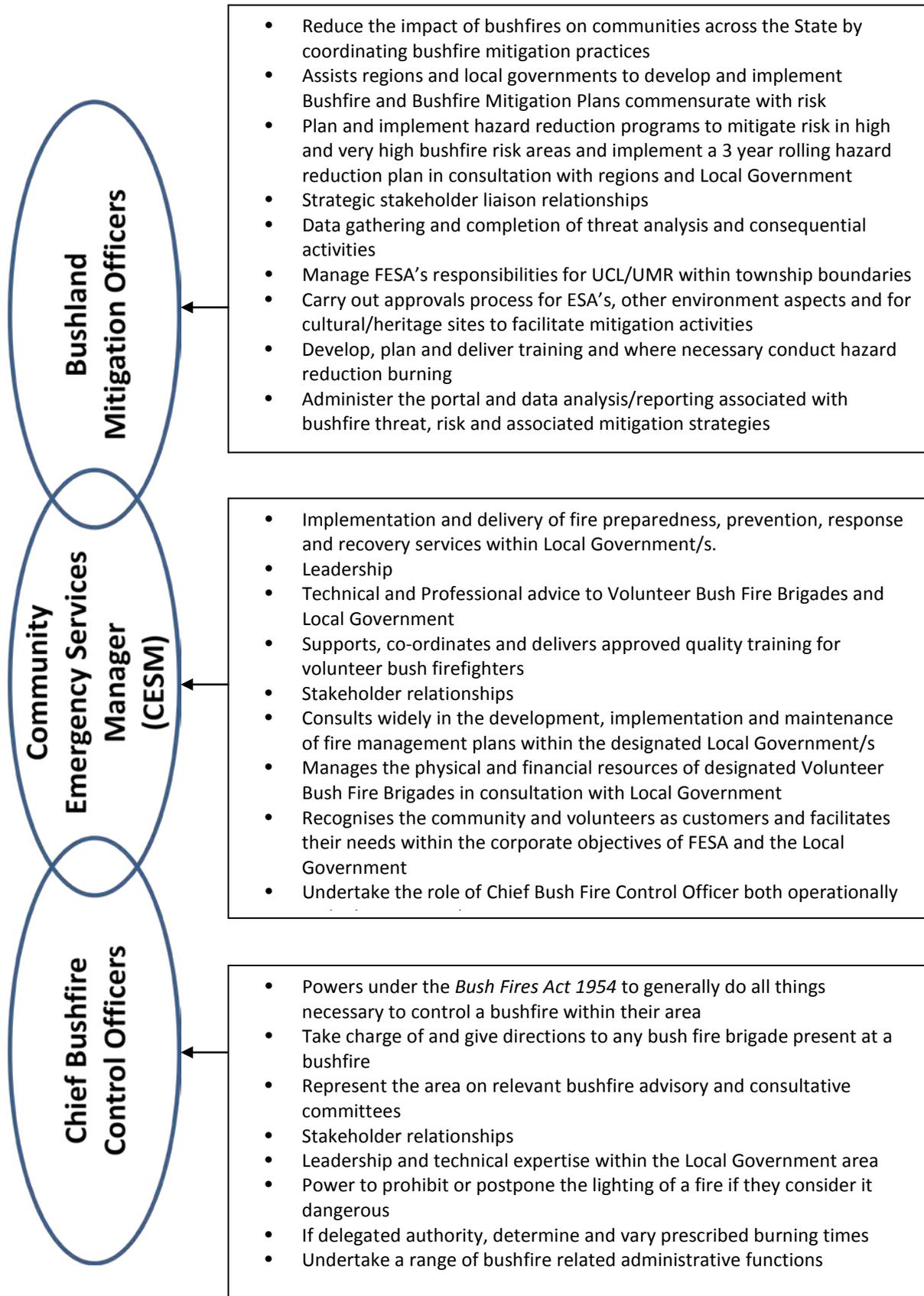
Whilst it may seem the incorporation of Bush Fire Brigade responsibility with Local Government is overly complex, it is a system that also applies in NSW and is not simply adaptable to wholesale change and realignment without structured facilitation. FESA believes this situation can be rectified over time through the existing Community Emergency Services Manager program and the forthcoming legislative changes. Notwithstanding these issues, fire prevention responsibility will continue to remain with Local Government and other landowners.

In addition the progressive appointment of Bushland Mitigation Officers and the adoption of a joined-up mitigation program and system through the Integrated Bushfire Risk Management System (IBRMS) is a further enhancement to the current arrangements.

The appointment of new positions, separate from the existing programs and/or wholesale realignment of responsibilities runs the real risk of putting back the achievements to date and disenfranchising local stakeholders through the process. In FESA's opinion a much better approach would be to enhance and expedite the extension/reach of existing programs which would be far more effective and efficient and underpins its submissions in this regard.

The combination of the current approach, supported by more direct accountability through structural change, integrated state operations/incident management and development of a state capability model will deliver overtime will desired organisational landscape to achieve improvement and alignment into the future.

Figure 2 – Local inter-relationships to achieving a Bushfire Safe - WA



5.3.2 NOMINATION OF A SINGLE AGENCY RESPONSIBLE FOR BUSHFIRE MANAGEMENT WITHIN WA

5.3.2.1 The Case for Change

The existing system of shared responsibility and resultant duplication in the responsibility and management of bushfire policy, planning and mitigation activities continues to cause inconsistencies, duplication and shared accountability for bushfire management. These arrangements are historically based and cause confusion, and FESA believes any improvements that can be made through collaborative relationships have already been achieved to the greatest degree possible without more robust structural change. There is sufficient evidence through several other Inquiries, both intra- and inter-state, particularly regarding the need for greater clarity and line of sight accountability and control for bushfire management, that FESA believes the State's arrangements have now matured to a point where a further change and improvements can be facilitated. The recent VBRC and other Inquiries have all explored this issue and made findings in this regard, which share FESA's view that further structural reform is now necessary to continue to enhance the State's bushfire management arrangements.

It should be noted that comparisons between the Victorian model and WA circumstances are quite different. WA comes from a completely different starting position in having already commenced a structural reform program (albeit with an understanding that more is required) and with FESA as an amalgamated service, the only element practically sitting outside of this service is DEC, given the relative integration of Local Government into FESA's overarching arrangements. This is truly appropriate; however, consistent with the Commission's findings, operational improvement is certainly warranted.

The IBMC has gone some way to achieving this but still relies on collaboration and lacks the authority to mandate reform and operational improvements in the manner FESA considers necessary for the future of bushfire management in WA. It is on this basis that FESA is recommending structural reform. Absent of authority, any proposed structure will continue to rely on relationships and collaboration, but can never achieve a truly sustainable model to the level necessary in today's operating environment, based on relationships and collaboration which can be here today and gone tomorrow.

FESA supports the position espoused in the VBRC where "both Professors Leonard and 't Hart urged caution before embarking on a merger or amalgamation. The 'virtues of mergers are way overrated ... that is particularly true when the different kinds of organisations that you are merging are actually quite different from each other"⁵.

This position clearly recognises the strengths and benefits in the existing FESA integrated model of like organisations versus an amalgamation with DEC which is unlike FESA because of its land management focus and unique skills set and culture. It is for this reason that DEC is not a fire service and FESA is not a land manager.

The Commission proposes the introduction of a new position of Fire Commissioner to lead the fire services and to undertake a program aimed at improving integration and interoperability

⁵ Ibid [s 10.3.2]

between the different fire agencies. The occupant of the new position would also perform the role of State Controller under Victoria's emergency management framework.⁶

Professor 't Hart, an expert in management and organisational change, emphasised the risks associated with 'overstretching the lessons from Black Saturday':

Redesigning emergency management systems or organisations often happens as a result of the sheer momentum for change created by the occurrence of a recent high impact tragedy. Unfortunately, there is plenty of research to suggest that such crisis-induced reforms may create as many vulnerabilities as they seek to eliminate—particularly when they are too narrowly focussed on 'winning the most recent war'.

Whilst the Review may be tempted to use the Victorian outcomes, FESA submits that the following clearly demonstrates guiding principles that are most relevant for the Review to consider in the context of WA and its future structural arrangements:

- WA is coming from a different starting base, with FESA already well established as an integrated model;
- FESA and DEC are uniquely different and have different roles, and there is no suggestion from FESA that it should amalgamate, although operational improvements do need to occur;
- Disaster prevention, preparedness and response is an un-conflicted core business for FESA;
- The IBMC has been a useful avenue to facilitate a greater level of collaboration however this approach continues to rely on relationship and collaboration and lacks an appropriate level of authority to mandate change;
- Proposed legislative change will facilitate the transition of Bush Fire Brigades administration and operational activities from Local Government to FESA in a collaborative manner;
- The size and diversity of WA results in clearly two discrete 'seasons' (north and south) with resultant potential for concurrent major emergencies across an all hazards perspective, which is what FESA manages through its integrated structure; and
- Time and distance considerations are very prominent in establishing weight of attack and surge capacity requirements of agencies.

FESA submits these are all relevant considerations in the WA context.

⁶ 2009 Victorian Bushfires Royal Commission; s 10

5.3.2.2 Structural Reform Options Analysis

FESA supports the positions outlined above by both Professors Leonard and 't Hart and does not propose an amalgamation of the services. FESA respects and appreciates DEC's role as public land managers and that this inherently involves the use of fire as a core element of land management. FESA also supports the role of Local Government and believes any issues associated with this can be adequately addressed through the proposed recommendation and consequential legislative amendments arising from the *Community Development and Justice Standing Committee*.

Further, FESA believes the Review in considering this issue must put significant weight on the complexities and unique ethos of volunteers and their ability to sustain greater change than what has already occurred since the establishment of FESA in 1999 and that which is currently before them.

However, FESA believes an incremental enhancement through structural change will facilitate greater integration between the agencies and a 'joined-up' approach to service delivery through all aspects of the established Emergency Management Continuum of Prevention, Preparedness, Response and Recovery (PPRR).

FESA submits this type of reform is only necessary for *bushfire*, as all other hazards within the State's emergency management arrangements only have a single *controlling agency*, whereas for bushfire, save for any s 13 declaration under the *Bush Fires Act 1954*, this is spread between Local Government, FESA and DEC purely on a land tenure basis.

To assist consideration of the most appropriate structural outcome, FESA developed a set of 'design principles' and evaluated each option against these principles. On the basis of an evaluation against these design principles, FESA submits the following structural reform option as the preferred model for the Inquiry to consider and recommend to Government:

5.3.2.3 Preferred Model - Appointment of FESA as the State Bushfire Authority

Building upon its comprehensive statewide capacity, capability, existing programs and strong links with Local Government in particular, in addition to its already established designation as the HMA for bushfire response, FESA submits its establishment as the single statewide bushfire management authority is both logical and sound public policy and will address the identified issues and overcome the current situation, ambiguity and lack of integration through the separation of responsibilities between agencies that currently exists within WA.

FESA further submits that the issue of *control* during emergencies cannot be separated from the broader whole-of-system authority (as opposed to responsibility to deliver) to determine standards, policy and systems relevant to prevention and preparedness planning and associated activities.

As such, this option proposes to establish FESA as the single statewide bushfire management authority which provides 'end-to-end' and 'whole-of-system' consistency and leadership for bushfire management within WA. Separation of authority for any of the elements across the established Emergency Management Continuum (PPRR) operating within WA can have catastrophic effects on the effective and efficient management of emergencies and lead to segregation and inconsistency.

It should be very clear that FESA does not advocate that the existing prevention responsibilities, nor those responsibilities currently residing with DEC for public land management, transition to it under this proposal. Put simply, all that is proposed through this proposal is that FESA would provide overarching policy, standards and general direction over bushfire management activities for the State, after an appropriate consultation process with key stakeholders.

These proposals are a natural extension to recommendation 40 of the *Community Development and Justice Standing Committee*, and are consistent with the principles underpinning the array of recommendations made by the Committee and the practical application of how the bushfire management system operates on the ground today, including the revised ability for FESA to assume control of bushfires (s 13 of the *Bush Fires Act 1954*), responsibility of FESA to facilitate the *Interagency Bushfire Management Committee*, (under direction of the Minister for Police, Emergency Services and Road Safety in February 2010) its formal authority in *Westplan – Bushfire* (under s 20(1) of the *Emergency Management Act 2005*) and FESA's extensive statewide capacity and capability.

If accepted, this proposal could also easily be integrated into the current work to implement recommendation 2 of the Committee in the establishment of a single emergency services Act (*CDJSC – "Inquiry into Fire and Emergency Services Legislation": 2006*).

This model is also more closely aligned with previous findings and recommendations from the WA Auditor General (2004), *CDJSC* (2006), WA Coroner (2009) and the model adopted in NSW with the Rural Fire Service. It also contextualises the different starting positions between Victoria, the new model as recommended by the *VBRC* and WA, and builds upon the existing successful programs.

This option is also the least disruptive and considered to be the most effective in a WA context.

5.4 THEME 2 STRATEGIC CAPABILITY BUILDING

The following components of this theme are outlined in detail within the full submission:

- Statewide Capability Model;
- Whole-of-Government resource coordination system;
- Structured recognition and use of local knowledge and structured incident management accreditation system; and
- Enhancing volunteerism.

Desired Outcome:

Implementation of the proposals for improvement outlined in this theme will deliver a single integrated capability model for the State commensurate with risk and underpinned by a structured approach to utilising capability from across Government to contribute to a more Bushfire Safe - WA. This will include direct ownership and input at a local level, a sense of belonging/purpose across Government in times of Bushfires and continuing to enhance volunteer capability and capacity.

Linked to:

Overarching Principle 2

The need to facilitate an integrated approach to single line of control and accountability.

5.4.1 DEVELOPMENT OF A SINGLE STATE CAPABILITY MODEL

Consistent with the separation of the State arrangements, spanning different agencies and not being bound by a single integrated statewide policy, plans, systems or standards, overall statewide bushfire *capability* is presently all done at an agency level with little/no reference to another agencies actual or planned capability or capacity. This leads to duplication, inefficiency and certainly does not result in the level of *interoperability* that one should expect from agencies within the same State for the same hazard type.

FESA firmly believe the planning for and building of capability for bushfire (and for that matter any other hazard) should be done at an integrated statewide level, under the auspices of the responsible response HMA for the particular hazard type, in the case of bushfire this being FESA (SEMC September 2010).

5.4.1.1 Objective of State Bushfire Capability Model

The objective of the development of a *State Bushfire Capability Model* is to establish, plan and maintain an appropriate level of capability to manage bushfire in accordance with all agencies statutory obligations, commensurate with the bushfire risk that exists in WA.

This will be achieved in a structured and incremental manner recognising the current resource / budget constraints and priorities whilst also exploiting all available opportunities to maximise partnerships with other agencies and industry, thus minimising the financial burden and investment needs of agencies and Government.

This concept will also allow the necessary spread of service demand across the State commensurate with the state risk assessment and strategic location plans to support service delivery from both a FESA and multi-agency perspective.

The development of a *State Bushfire Capability Model* will attempt to integrate bushfire emergency management requirements across FESA and other agencies thus providing concise and logical parameters upon which the following can occur:

- Single integrated budget and business case / business planning submissions can be made (either internally or through the Government budgetary processes);
- Systematic operational planning at State, Regional and Local level can be undertaken in accordance with the model;
- Multi-Agency planning and co-operative arrangements can be undertaken from a 'whole of government' perspective;
- Internal liaison and planning priorities can be provided within agencies;
- Legislative changes and other external influences can occur, in line with the strategic direction.

In doing so, it will endeavour to build off FESA's strengths as a leader in emergency and bushfire management.

5.4.1.2 Capability Elements and Preparedness

Recognising the resources available to FESA (and other agencies) will always be limited, whether the task is preparing for operations or fulfilling operational commitments, FESA's operational management framework provides a mechanism to balance competing demands of generating capability for near-term tasks from a *capability baseline*⁷ (preparedness) and developing *future capability* (modernisation). Balance is required between both because decisions to invest in one area will generally result in fewer resources for the other.

Current capability is managed principally by allocating resources to Brigades, whether they be Bush Fire Brigades (under the control of Local Government) or FESA Brigades/Units. FESA suggests that these resources should be described in terms of the following *Fundamental Inputs to Capability* (FIC): organisation, personnel, collective training, major systems, supplies, facilities, support, and command and management.

Currently decisions concerning this allocation are based on preparedness requirements identified by either the Local Government (CBFCO) or FESA Chief Operations Officer in accordance with their respective statutory responsibilities⁸.

⁷ *Capability Baseline* refers to the core capabilities and skills (both individual and collective) required by FESA to perform operational tasks.

⁸ In accordance with Bush Fires Act and FESA Act

5.4.1.3 Elements of Capability – Fundamentals Inputs to Capability (FIC)

FESA propose capability should be generated by the interaction of the eight FIC elements as outlined in Figure 3 below. Each element is also described below to provide clarity to the manner in which the capability assessment has been conducted and presented in a subsequent section.

Figure 3 - Fundamental Inputs to establishing Bushfire Safe – WA Capability



5.4.2 WHOLE-OF-GOVERNMENT RESOURCE COORDINATION SYSTEM

Each year WA’s emergency management agencies provide direct or supporting services to manage a wide range of hazards and community disruptions, both within WA and interstate/internationally, while continuing to deliver an acceptable standard of ‘normal business’ to their respective communities.

In recent times we have seen the need for the ability to systematically plan for crisis at all levels of Government in a cohesive manner using a sector-wide approach extending to all aspects of the Public Service.

Today, no agency should be expected to have the full range of capability to manage major and extended incidents in isolation to the overall capability which may exist from a ‘whole-of-government’ perspective. A recent and real example of this was during the *Perth Hills Fires* where FESA recognised the need for additional GIS mapping expertise and capacity. Through a collaborative arrangement between FESA and Landgate an additional pool of volunteers from Landgate indicated a willingness to assist and from this rosters were developed. Whilst the

Landgate volunteers were not required at the end of the day, it is a very good example of taking a whole-of-government approach to future strategic resourcing models to support major emergencies. A similar approach is taken with media support and other elements of the FESA structure.

This approach has a number of benefits, such as:

- Removing narrow single agency approach to capability modelling;
- Effective and efficient utilisation of government resources;
- A sense of purpose and community spirit for those involved from agencies and individuals not normally involved in emergency management;
- Increasing the capacity of emergency management agencies by adopting a whole-of-government networked approach to capability;
- Providing diversity and opportunity for individuals involved.

The proposed coordination model is aimed to bridge the gap between the traditional silos of managing the emergency and maintaining a sustainable level of business operations for continuity throughout the emergency event. It provides a simple structure to allow an individual, no matter where they are employed (local or state government) to engage with and contribute to emergency management within the State or potentially forming part of the State's interstate/international deployment team during times of crisis.

Case Study

A clear example of taking a whole-of-government approach to resource coordination is the composition of an Urban Search and Rescue (USAR) team, which requires structural engineering and medical expertise, in addition to the standard USAR operators. Whilst FESA would compose this team, the engineering expertise and medical expertise will continue to be sourced from outside the FESA resource base and come from other Government Departments, Local Government or service providers such as St John Ambulance. This arrangement is logical, efficient and effective as an integrated WA capability, but needs to be structured to operate effectively through all elements of the PRRR continuum.

A more recent and relevant example to this Review is the sourcing and use of GIS expertise and the use of media relations and call centre staff to support the Perth Hills fires and other major emergencies.

Taking an integrated and structured approach rather than agency-by-agency or event-by-event approach to this enables a methodology to be established which creates accountability for the total workforce at any one time, present or future.

5.5 THEME 3 COMMUNITY FIRE SAFETY PLANNING

- Building engaged and active fire safe communities;
- Fire hydrant ownership
- Planning and construction in bushfire prone areas;
- Embedding the “*primacy of life*” principle;
- Evolution of existing bushfire planning systems to more localised township protection/community level plans;
- Bushfire Risk Management within indigenous communities; and
- Prescribed burning / *FESA Integrated Bushfire Risk Management System (IBRMS)*.

Desired Outcome:

Implementation of the proposals for improvement outlined in this theme will deliver an active and engaged community contributing to a more Bushfire Safe – WA by direct participation in prevention and mitigating the potential effects of bushfire through enhanced building standards, an appreciation of the primacy of life principle, involvement in developing and exercising their local plans and a more engaged indigenous community.

Linked to:

Overarching Principle 3

The need to empower the community and actively engage them in the planning processes and associated bushfire management arrangements for their local environment, commensurate with risk.

5.5.1 BUILDING AN ACTIVE AND ENGAGED FIRE SAFE COMMUNITY

FESA has proactively been modifying and evolving its service delivery model to ensure it maximises the opportunities to engage with the community in all facets of its business. It is vitally important that this occurs in a consistent manner and is directly aligned to national and state-wide bushfire management policy, plans and associated activities.

FESA recognises that a safer community can best be achieved through the formation of partnerships with communities that enhance each community’s level of resilience (self-reliance). To achieve this, FESA has embraced a more facilitative role in managing risk that involves greater community participation. FESA largely achieves this through its suite of community engagement programs and strategies.

FESA recognises the importance of school aged education as a long term approach to building community resilience. FESA’s school aged programs apply continuation learning across a range of curriculum linked, age appropriate programs. These programs assist in developing sound behaviour

and attitudes towards risk in young people in preparation for longer term risk exposure. However, the school aged programs do not seek to improve immediate levels of community preparedness

A key focus of FESA's community engagement programs is community prevention and preparedness as the impacts of disasters on the community are significantly influenced by the level of prevention and preparation by the community. These activities help to build community resilience to disasters because they build the capacity of the community to withstand, recover from, and respond positively to an emergency or crisis.

FESA believes that community engagement increases resilience, firstly by raising the awareness of the community to the risks they face and empowering and secondly by enabling them to undertake activities that reduce their exposure to this risk. This is achieved through a range of education and empowerment methods that require a long-term approach which involves the establishment of trust and active partnerships between the community and FESA.

Essentially resilience is increased by sharing responsibility for the risk and making the community *active participants* rather than *passive recipients* in risk reduction strategies.

Traditionally interaction between the emergency services and the community has primarily involved a one-way transfer of information and it is now widely accepted that it is unrealistic to expect that applying this type of interaction will have an immediate impact on the community's behaviour. It ignores the complex process involved firstly in communicating risk and secondly in aligning this to the readiness of the community to change. This traditional approach may result in the community becoming more aware of the risks and understanding the key safety messages; however, it is unlikely to lead to the behaviour change necessary to actively mitigate risk.

Community engagement, however, embraces a more complex process of education and involves a much higher level of interaction between the emergency services and the community. It embraces a two-way process of education that enables a greater understanding of a given situation and the establishment of solutions (i.e. treatments) appropriate to the needs of particular individuals or groups within a specific risk environment or situation. In this approach, the transfer of information is only one aspect of the interaction between the emergency services and the community. It also involves shared decision making, two-way education and capacity building and, importantly, the building of relationships and trust. This more complex process is challenging and to be effective needs to occur at a local level.

FESA's community engagement framework (attached as Appendix 10 of its submission) seeks to foster a more localised approach to its programs to embrace this more complex process. A localised approach is necessary to enable the community to become active participants in the process. It also means the process is able to reflect the local situation both in terms of the hazard profile and the particularities of the local community. In addition, involving the community at the local level gives the individual community members a greater opportunity to be involved in negotiating how to address their needs.

FESA's community engagement programs aim to facilitate this diversity by adopting a more localised community-centred approach and actively involving the community in problem solving and decision making rather than simply being passive recipients of generic, broad scale one-off

information. Involving the community in decision making is more likely to lead to behavioural change because it enables individuals to take greater responsibility for their own safety. Where the community has had the opportunity to develop trust in the process they are more likely to accept responsibility for their specific role/s in reducing risk. This is enhanced further when the community can trust they are being supported by agencies such as FESA who are also undertaking a broad range of complementary strategies to manage the risk.

A *localised* community engagement process is more likely to be sustainable as it enables the community to gradually take on greater and greater responsibility for their own risk environment/s.

5.5.1.1 Existing Community Development System and Programs

FESA recognises that the community's level of understanding of their exposure to risk and the responsibility they take for reducing or preparing for this risk varies significantly across the diverse groups and individuals who make up the 'community' of WA. The community engagement programs and strategies that FESA facilitates address this diversity by embracing a localised and community-centred approach.

FESA's program approach recognises that effective community engagement is a long-term process that involves many people, including both community members and stakeholders, and therefore requires strong leadership and coordination. To facilitate this longer term view to engaging the community, FESA's community engagement programs are based on a 5 year term in accordance with phase 1 of FESA's *2023 Shaping Our Future Strategy*.

The programs are developed around five core community-centred program principles:

- Collaborative arrangements;
- Evidence based decision making;
- Community and organisational needs;
- Appropriate risk communication; and
- Treatment options.

FESA's community engagement programs are generally developed around a particular risk (hazard) profile. This is largely due to the variable nature of the hazards that FESA is responsible for managing, in particular the seasonal and geographic variance and the various stakeholder roles, responsibilities and capacity.

Individual hazard programs enable the development of overarching strategies that reflect the specifics of a hazard and also allow those hazards with a greater risk priority to have more investment and a greater level of impact. It is also important to develop programs that realistically reflect community need and this also varies between hazards.

An extremely important aspect of this multi-hazard arrangement is to ensure the community members are not overwhelmed with competing messages and expectations. For the information to penetrate the community, it must be adaptable and comprehensible to the general community member.

This issue is further compounded with the diametrically opposed messages presented to the community which have the very real potential to confuse the community, for instance, the differences in messaging for different hazard types which may be occurring concurrently (e.g. leave early for bushfire versus stay indoors for heatwave, which can both be occurring at the same time in the same location).

The programs by nature foster local level activities; however, they still need to be aligned strategically to risk priority at the State level.

5.5.1.2 Bushfire Community Engagement Program

FESA has developed the *Bushfire Community Engagement Program 2008-2013* to provide a strategic approach to the planning, development, implementation and evaluation of its community engagement activities. It seeks to facilitate a collaborative and coordinated approach across a range of bushfire stakeholders and the community to undertake activities aimed at reducing bushfire risk.

The program aim is to “reduce the level of bushfire risk to the community”. The program outcomes are to:

- Increase community awareness to the risk of bushfire;
- Increase the level of timely preparedness by the community; and
- Increase the level of resilience of the community.

The program is facilitated by the Community Safety Branch within the Community Engagement Directorate which comprises of a manager and three coordinators. Each of the Community Safety Coordinators facilitates the bushfire program in their respective regions. FESA has established a Bushfire Community Engagement and Communications Committee to ensure coordination and collaboration across all bushfire stakeholders. IBMC have discussed the potential to integrate a committee into their structure in relation to community engagement, but have decided to consider this further based on the outcomes of the Review.

5.5.1.3 National Position

FESA places significant focus on active participation in the national bushfire community safety arena, and since the Victorian bushfires FESA has been an active contributor to the development of evidence based strategies and national positions designed to improve community safety from bushfire throughout Australia.

In September 2010 FESA, as a member of AFAC, endorsed the *National Bushfire and Community Safety Position* (AFAC 2010) for application within WA. Accordingly, FESA has immediately commenced the processes necessary to implement all elements of this national and State adopted position into State plans, policies and associated arrangements.

Not all elements of the *National Bushfire and Community Safety Position* have been fully implemented as there is considerable state-wide, cross sectoral work and collaboration to be carried out in respect of contextualising and implementing all key elements. This includes the identification and designation of *places of shelter* from bushfire. This issue alone requires extensive research, ground testing, consultation, the development of a relevant State Policy and significant

resource support. It also needs to be fully investigated in relation to factors such as integration into operational arrangements during the preparedness and response phases, and consideration of vulnerable groups within affected communities and how these people would be treated in this regard.

5.5.1.4 2010-11 Southern Bushfire Season

FESA's programmed 2010-11 bushfire campaign targeted five key communication areas to focus activities in the following ways:

- Focus on the fact that the majority of people do not have a bushfire survival plan and develop 'call to action' messages to target them;
- Promote the need for people to actively seek information, be aware of their surroundings and watch for signs of bushfire, especially smoke and flames;
- Increase the awareness of the bushfire warning system and the three levels of alert used once a fire has started;
- Communicate what the Fire Danger Rating tells people, how they can use it and why they should use it;
- Educate and inform people about where they should shelter in their homes if they cannot leave; and
- Work on addressing myths around the best place to shelter.

5.5.1.5 Community Engagement – Evaluation of Effectiveness

FESA recognises that engaging the community requires a significant investment in time and resources, and more often than not this includes the invaluable time of volunteers. FESA is keen to ensure the activities undertaken have the potential to affect outcomes and not just focus on outputs.

At the end of each hazard season FESA undertakes a program evaluation with stakeholders. The outcomes of this process are then integrated into the planning process for the subsequent season.

FESA is also a member of the Bushfire CRC and AFAC through which it commissions and participates in both national and local research. The research provides an important evidence base for the programs.

5.5.1.6 Perth Hills Fires – Community Engagement Lessons Learnt

FESA and the Bushfire Cooperative Research Centre are collaborating to conduct bushfire community safety research following the Perth Hills Bushfires on 6 February 2011. The research aims to understand how the bushfire affected communities experienced the fire with a view to informing future bushfire safety; engagement strategies and activities. The utilisation of the Bushfire CRC supported by the University of Western Australia, together with researchers from La Trobe and RMIT Universities in Victoria, provides both independence and academic rigour to the outcomes.

Up to 400 residents from the *Perth Hills Fires* area have been asked to take part in a study to understand and improve bushfire community safety. This involved teams of researchers from the

University of Western Australia, together with researchers from La Trobe and RMIT Universities in Victoria, interviewing up to 400 residents from Roleystone, Kelmscott and Red Hill. Face to face interviews commenced on the 28 February 2011 and were completed by 31 March 2011. In addition to these face to face interviews a mail-out survey was also undertaken but this will not be completed until 30 April 2011.

Currently lessons learnt are limited as they are largely based on anecdotal evidence. The Bushfire CRC research will provide a rigorous and valid evidence base that is thoroughly analysed. The research is aligned to previous bushfire community safety research undertaken following the Victorian bushfires in 2001 and the *Lake Clifton Bushfires* in January 2010. This provides an important opportunity for comparative analysis and will significantly strengthen the underpinning research to inform future programs within WA.

As requested by the Review during the hearing conducted on 29 March 2011, the CRC survey instruments (for both face to face and mail-out surveys) being used are attached as Appendix 12 and 13 of this submission.

The final research report will not be available until 28 June 2011, which FESA understands is too late for the Review purposes. However, a preliminary statistical report based on the face to face interviews and without any analysis (i.e. raw data) is attached as Appendix 14 for consideration of the Review.

5.5.2 PLANNING AND CONSTRUCTION IN BUSHFIRE PRONE AREAS

‘Peri-urban’ literally means the area around an urban settlement. It is distinctive in its diversity, having a mix of land uses and residents. It is rural in appearance but many residents will have jobs in the nearby urban area to which they commute. The settlement patterns within WA create a diverse area of current or potential peri-urban areas. These areas are popular for those commuting to jobs in population centres, including Perth.

A list of identified high and very high bushfire risk areas is attached as Appendix 15 of FESA’s detailed submission.

With the devastation caused by the *Perth Hills Fires* destroying 71 houses and damaging several more, coupled with the general expansion of peri-urban areas across Australia (and WA in particular), a critical evaluation is needed of future building standards and land-use planning commensurate with risk and the overarching *primacy of life* principle.

5.5.2.1 Planning for Bush Fire Protection Guidelines

The *Planning for Bush Fire Protection* guidelines were first established in WA in 2001 in accordance with Department of Planning Policy DC 3.7 *Fire Planning and Planning for Bush Fire Protection*.

In 2010, FESA and the Department of Planning completed a review of *Planning for Bush Fire Protection* and developed revised planning guidelines for the consideration of the SEMC⁹ and the Western Australian Planning Commission (WAPC).

The revised guidelines were prepared in accordance with clause 6 of State Planning Policy No. 3.4 *Natural Hazards and Disasters*. The guidelines set out a range of matters that need to be addressed at various stages of the planning process, to provide an appropriate level of protection to life and property from bushfires and avoid inappropriately located or designed land use, subdivision and development on land where a bushfire risk is identified.

The objectives of the guidelines are:

Objective 1

To identify areas where fire poses a significant threat to life and property, and through the use of an assessment methodology, determine the level of bush fire hazard applying to those areas.

Objective 2

To avoid increased fire risk to life and property through inappropriately located or designed land use, subdivision and development.

Objective 3

To ensure that land use, subdivision and development takes into account fire protection requirements and includes specified fire protection measures where there is any risk from fires, especially involving land that has a moderate or extreme bush fire hazard LEVEL or a bush fire attack level between BAL-12.5 and BAL-FZ.

5.5.2.2 Introduction of Interim Guidelines – Planning for Bushfire Protection (Edition 2)

These guidelines were introduced in May 2010 as ‘interim’ guidelines due to the acknowledged need for further review following the release of the final report of the VBRC and also to invite submissions on the interim guidelines. Whilst it may have been deemed easier to ‘wait’ for the final VBRC report, FESA and the Department of Planning identified that it was important to introduce the enhanced guidelines to benefit community safety from the effects of bushfire as soon as possible.

⁹ This was done through the Land Use Planning Working Group to the State Mitigation Committee.

5.5.2.3 The Review of Interim Guidelines

FESA and the Department of Planning began the review of the *Planning for Bush Fire Protection (Edition 2)* guidelines with the publication of the VBRC final report. The review will be completed during the second quarter of 2011.

Although the introduction of Edition 2 of the guidelines represents a significant step forward in fire risk management, FESA believes there are a number of additional measures that could be taken to strengthen their impact and improve the safety of communities from the threat of bushfire.

Whilst the guidelines are supported by State Planning Policy, they have not been enacted to ensure consistent application throughout the State. Local governments are encouraged to adopt the guidelines as policy, but the majority do not. As guidelines, they are subject to individual interpretation, with some Local Government jurisdictions taking a firm line whilst others see them as 'just a guide'.

5.5.2.4 The Application of Bushfire Protection Requirements to Rebuilding after loss and destruction

The existing guidelines are currently designed for land use planning, land development and land intensification, and unless subject to individual policy by Local Government (through the exercise of statutory planning discretion) they are not applied to rebuilding on existing developments such as that which occurs following a devastating bushfire that has destroyed numerous homes (e.g. the *Perth Hills Fires*).

5.5.2.5 Australian Construction Standard for Bushfire Prone Areas

Australian Standard 3959 (AS 3959) is the standard for construction in bushfire prone areas. It has effect through the Building Code of Australia (Volume 2, part 3.7.4) and requires both the assessment of a site and the construction of buildings to improve their performance when subject to burning debris, radiant heat and flame contact. The triggering of the Building Code of Australia (BCA) requirements for construction in bushfire prone areas requires an area to be identified as 'likely to be subject to bushfire' (bushfire prone) through legislation; otherwise AS 3959 has no legal effect under Western Australian building legislation.

Without the declaration of a bushfire prone area, the local authority (via the building inspector) does not have the necessary statutory power to ensure construction occurs to the appropriate standard for the potential bushfire risk.

Currently in WA, the power to 'declare' bushfire prone areas resides exclusively with local governments through the application of regional or town planning schemes or the *Local Government (Miscellaneous Provisions) Act 1960*. Despite the high number of locations in this State that have large areas with moderate to extreme bushfire risk, there are only a small number of local governments that have exercised the power to declare bushfire prone areas.

Some local governments have cited potential for increased liabilities, lowering property prices, insurance issues and potential developers viewing the imposition of additional construction standards as a disincentive to invest in their area as reasons for not exercising this power. FESA

submits these issues need to be fully understood and should not in themselves override responsible planning laws that are premised on the *primacy of life* principle.

Whilst the *Planning for Bush Fire Protection (Edition 2)* guidelines recommend that all homes be built to the appropriate bushfire risk level, regardless of whether the home is built in a 'declared' bushfire prone area or not, the reality is that there is no legal requirement to improve the construction standards and this rarely occurs if the area has not been 'declared'. Moreover the lack of 'take-up' of including these guidelines into local planning laws with no central legislative requirement for this to occur will never, in FESA's opinion, result in a uniform State-wide approach to this issue and the consequential risk reduction in life and property loss.

5.5.2.6 Legislative Reform – Planning and Construction in Bushfire Prone Areas

FESA believes that legislative reform is required to:

- Incorporate the bushfire protection measures as State development *requirements* rather than guidelines; and
- More consistently identify and declare areas that are bushfire prone.

FESA is currently working with key stakeholders including the Department of Planning and the Building Commission Division within the Department of Commerce, and is in the final stages of developing a submission on legislative reform options for the 'declaration of bushfire-prone areas' for consideration by Cabinet.

5.5.2.7 Retrospective Application of Planning and Construction Standards

Whilst the retrospective application of planning and construction standards is costly and problematic, the retrofitting of ember protection for homes along with the implementation of building protection and hazard separation zones in bushfire prone areas would significantly improve community safety from the threat of bushfire.

Increased standards supported by legislation could also be applied to *rebuilding* on developed land where bushfire threat exists, such as those areas impacted by the recent *Perth Hills Fires*. This would address issues such as construction standards, building protection and hazard separation zones, although matters such as land suitability, development design and road layout would be significantly complex issues for local governments to remedy in well established but poorly planned communities. The level of home owner insurance coverage may also be affected by the costs of increased construction standards.

Once again, FESA submits these are appropriate considerations that need further analysis by the Review but should not by themselves override the *primacy of life* principle.

5.5.2.8 Evaporative Coolers

A specific reference in these fires and contained within the terms of reference relates to the "*operation of evaporative coolers*". This issue has a specific relevance to future building standards and construction in bushfire prone areas. These devices are a popular and effective cooling mechanism, given the relatively benign relative humidity in WA, and they are used in a large

number of houses across bushfire prone areas. This was certainly the case with a number of houses in the *Perth Hills Fires* area.

Whilst the house loss assessment research for the *Perth Hills Fires* is not yet complete, there is clear evidence that a number of homes were destroyed after embers entered evaporative coolers.

The combustible nature of evaporative cooler components increases the risk of fire from ember attack on homes where they are installed. Many homes burnt down after embers entered the cooling systems and ignited the filter pads. Since 2001 FESA has taken a number of proactive steps to reduce the danger to the community, including but not limited to:

- Submitting a discussion paper to the AFAC;
- Producing safety material to inform the community of the fire danger posed by evaporative coolers, including some tips on how that risk can be mitigated;
- Liaising with and writing to manufacturers and retailers of evaporative coolers and their components, alerting them of the dangers and recommending measures to mitigate risk;
- Recommending that fibreglass filters should be utilised rather than paper based filters; and
- Being involved in research projects with the University of Western Australia which included the design of an ember protective screen.

Unless specific design standards are incorporated, evaporative coolers do not meet the requirements of AS 3959 for construction in bushfire prone areas.

FESA submits that the proper application of the declaration of bushfire prone areas will prevent the further proliferation of unprotected evaporative coolers being installed in these bushfire risk locations and consequential risk of property loss. FESA also submits consideration should be given to some retrospective application of requirements for evaporative coolers already installed in homes within designated bushfire prone areas, although it appreciates this could have a significant financial impact on many Western Australians.

5.5.3 EMBEDDING THE “PRIMACY OF LIFE” PRINCIPLE

There is absolutely no doubt, supported by ample evidence and analysis, that *primacy of life* must underpin all aspects of bushfire management. FESA respect the use of prescribed burning on public land is a primary tool for fire management. However, this must be integrated into a single planning regime and premised on the *primacy of life* principle.

Likewise Incident Management Teams must ensure incident action plans include this principle as the overarching priority in managing an incident.

Whilst this may appear logical and a given, FESA believes a consistent and structured approach to embedding this principle into:

- State Fire Control Priorities, that informs the development of incident action plans and the focus of operations;
- The planning for and execution of mitigation activities and prescribed burning, regardless of tenure; and

- Consistent and clear direction to all activities, including the education of the media and community.

This issue is relatively self explanatory and in FESA's opinion must be supported by the Review, despite potential criticism from those that lost property in the *Perth Hills Fires* as a consequence of the Incident Management Team adopting this approach.

5.5.4 EVOLUTION OF BUSHFIRE PLANNING INTO TOWNSHIP PROTECTION/COMMUNITY LEVEL PLANS

Existing planning processes and frameworks do not extend to supporting community decision making or knowledge of local fire management arrangements (including what is expected of them and any limitations/constraints of emergency service organisations) that the community should be aware of in determining their own plans. As demonstrated in a range of emergency situations, community expectations for timely and accurate information to inform their individual decision making is at an unprecedented level. This places enormous expectations on controlling agencies in developing plans *with* and not *for* the community, engaging the community in the planning process, educating the community and agency personnel on the specific plans developed at a local level and finally managing information flow at the community level.

It is also important that when expecting the community to be *active participants* rather than *passive recipients* in emergency management, the community is fully cognisant of and integrated into the overall plans before, during and after an incident. A disjointed approach will inevitably result if this planning continuum is not established and achieved, which is contrary to the overall objectives of emergency management.

Suggestions that a Local Government area is the appropriate level for this to be considered 'community level' is also flawed as within a single municipality, several discrete townships (risk precincts) may exist that each require their own specific bushfire safety plan.

Westplan – Bushfire establishes a regime for "locally developed and implemented Bushfire Risk Management Plans (BFRMP) that incorporate prevention and mitigation strategies" which "represent a documented outcome of an application of the risk management process by all agencies to bushfire risks across a Local Government area regardless of tenure" (s 2.3 *Westplan – Bushfire*). In addition, *Westplan – Bushfire* documents that "preparedness strategies will be documented in each Local Government BFRMP by the Bushfire Advisory Committee and endorsed by the Local Government Council" (s 3.1). The plan also establishes that special needs and at risk groups "need to be identified and documented in Local Bushfire Risk Mitigation Plans" (s 3.2.5).

The challenge that confronts the State is to now evolve this planning regime to become more community centred and extend beyond *prevention* and *preparedness* to all elements of the emergency management continuum in an end-to-end manner, recognizing that this needs to occur at each layer of the planning framework.

FESA submits the underlying problems with the existing bushfire planning arrangements include the following:

- Planning is generally done at an agency level and as a consequence is also generally aligned to land tenure;
- The majority of planning is focused on prevention and mitigation and does not extend in a systemic manner into the response and recovery elements of the emergency management continuum;
- Planning processes fail to engage the community;
- There is a general lack of respect between plans developed in abutting areas, whether they be public/private, private/private or local government/local government;
- There is an actual or perceived conflict of interest with land management agencies having responsibility for fire prevention and fire suppression on public land when developing and executing plans;
- The lack of integration at the planning stages perpetuates the lack of integration at the response stages of an incident;
- A focus on planning solely at a Local Government or even a District (Regional) level does not take a holistic approach to risk that may extend contiguously across Local Government boundaries and should be treated as a single risk precinct.

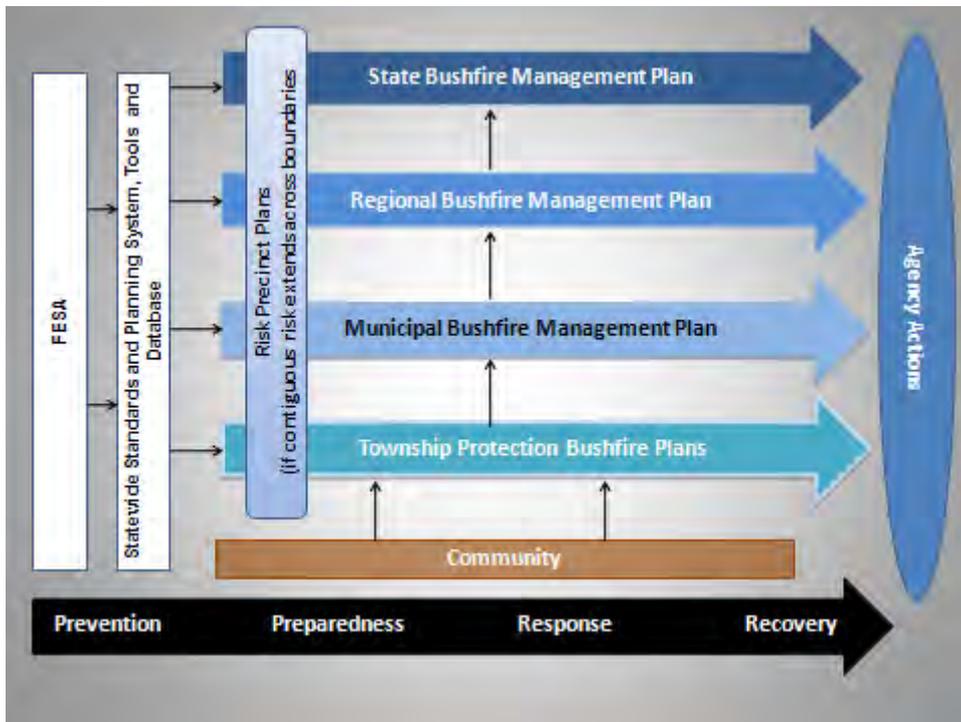
On the basis of the above observations, FESA submits, consistent with the common thread of integration and single line accountability that comes throughout this submission, that planning must extend to local community based township protection plans and needs to occur commensurate with risk and be tenure and boundary blind.

Through its active involvement in the planning process, the community should clearly understand the plan, which in turn will achieve the necessary culture change of having a shared sense of risk and responsibility between the community and responsible authorities. This should unlock the full potential of both the community and agencies by recognising they all have a 'joined-up' role before, during and after an event.

These plans should be exercised jointly with agencies and the communities to ensure the plans are understood, practiced and relevant.

In FESA's mind, the resultant integrated planning framework which engages with the community, extends throughout the complete emergency management continuum in an end-to-end manner, caters for risk precinct planning which may occur in circumstances of contiguous risk extending across or within boundaries and consequentially the layers of the proposed framework, and engages the community in local township protection plans; all of which is built off a common set of standards, systems, tools and using the same integrated database which are all established by FESA and the responsible planning authority. The structure also obligates agency actions across all aspects of managing bushfire within WA and actively contributes to a *Bushfire Safe – WA*. The following outlines the interrelationship between these elements of the proposed planning framework:

Figure 4 – Proposed integrated planning framework



Whilst the bushfire risk areas are all known to agencies and potentially the community, not many have an actual end-to-end plan in place commensurate with this risk. Elements of the PPRR continuum are treated in isolation and run as separate components. This is no longer acceptable and needs to be addressed through a consolidated integrated fire management planning framework.

FESA appreciates this will take some time to fully achieve, and it too has to take responsibility for the current state, but this integrated process must commence in order for the State to achieve a satisfactory level of bushfire preparedness.

Case Study

The basic principles of a future planning regime must include a structured appreciation of the local environment and risk, which will be achieved through the combination of adopting a standard system for the collection, dissemination and reporting of risk and mitigation activities. The adoption of the FESA Integrated Bushfire Risk Management System (IBRMS) and Bushfire Threat Analysis (BFTA) as the common platform will allow all stakeholders to have access to and input into an integrated planning regime. It can then be used to inform community based planning activities and most importantly translate into operational planning and integrated agency/community exercising against the plans.

It may be suggested that FESA should be able to easily roll-out the Bushfire Threat Analysis (BFTA) information as a standalone piece of information to inform communities of the risk environment for their particular area. However, a very important step in the planning process is the validation of "actual" fuel loads and associated local environs, which must be "ground truthed" and involve a range of key stakeholders to fully develop the threat and associated mitigation programs. This is a classic example which FESA confronts regularly, whereby an appreciation of the need for a structured end-to-end process is not fully understood and to release information in isolation to a complete and comprehensive process would lead to the very real potential of increasing risk through a disjointed and inconsistent process between all the respective players, none more so than the community themselves.

FESA fully appreciates the desirable state to complete this process as soon as practicable and is aiming to do so within its existing resource constraints. As an outcome of the recent Victorian Bushfires Royal Commission, significant funding (i.e. multi-million dollars) was provided to resource the completion of mapping and associated fuel management within bushfire prone areas. Unfortunately, FESA does not have this level of resource available to it and is taking every possible step to expedite this important process through programs such as the Bush Land Mitigation Officers and the like. It also needs to be understood that the "system" relies heavily on volunteers to undertake aspects of the overall program (i.e. Bushfire Ready Groups) and this is a finite resource which is heavily relied upon.

Having regard for the above it is unfortunate this level of analysis and planning was not completed for the Roleystone areas prior to the Perth Hills Fires, however FESA took a range of additional steps in the lead-up to the fire season to ensure residents in this area were acutely aware of the bushfire risk. This will be enhanced in the future, within available resources, through a more structured and integrated planning regime as suggested through this submission.

5.6 THEME 4 UNIFIED CONTROL

- Integration of agencies within a single State Operations Centre;
- Strategic intelligence management, including public information and use of social media;
- Clarity of definition around command, control and coordination; and
- Access to incident ground.

Desired Outcome:

Implementation of the proposals for improvement outlined in this theme will deliver an integrated control and incident management structure premised on a single line of control through a single state operations centre which avails itself and utilises strategic intelligence and integrated functions to inform decision making.

Linked to:

Overarching Principle 2

The need to facilitate an integrated approach to single line of control and accountability.

5.6.1 INTEGRATION OF AGENCIES WITHIN A SINGLE STATE OPERATIONS CENTRE

5.6.1.1 Context

Unified control must start at the top and penetrate long term culture change for integrated operations down through the individual agencies involved in bushfire management within WA. This notion has been identified by numerous inquiries but agency inaction has prevented effective integration of agencies' activities.

FESA has instituted unified control amongst its constituent services of the Fire and Rescue Service, Bush Fire Service, Volunteer Emergency Services, Volunteer Fire Services, State Emergency Service and Volunteer Marine Rescue Service. Previously each service had a separate Chief Officer or Executive Command structure.

This model is without equal in Australia; however, it is widely considered and promoted by other jurisdictions. The VBRC fell short of such a recommendation given it was unlikely to receive political acceptance due to the major restructures required.

The *Bush Fires Act 1954* legislative changes in 2010 further provided FESA with the ability to take control of all fires regardless of land tenure. However, this arrangement only applies once a declaration occurs and therefore has the deficiency of fire management agencies operating separately until it is considered appropriate to institute a s 13 declaration. Whilst this arrangement provides unity of control once declared, it lacks the lead-up continuity of the fire situation and runs the risk of establishing these arrangements too late. It is therefore extremely important for FESA

and partnering agencies to carefully consider the timing of such a declaration, to minimise this risk and maintain effective and efficient control over bushfires.

Whilst legislative provisions have changed and FESA is now the HMA for bushfire within WA which can assume control of bushfires under certain conditions regardless of land tenure (s 13 *Bush Fires Act 1954*), the supporting system to facilitate this and to facilitate agency integration is vitally important.

As the HMA for bushfire within WA, and having regard for its other proposals within this submission for a more integrated *systems approach* to managing bushfire, FESA intends to adopt an integrated approach to incident management, which includes statewide coordination. FESA strongly believes the finite resources available to these important roles need to be deployed in a manner which provides seamless, agency and tenure blind incident management and statewide deployment.

FESA believes that the construction of the new FESA headquarters at Cockburn Central (currently due for completion in 2011), which includes a new state of the art *State Operations Centre*, provides an ideal catalyst to commence this new approach to coordination and culture change. No longer is it acceptable for agencies to simply collocate in the one centre and/or maintain their separate operations. There is no greater example of where this was highlighted than the outcomes of the *VBRC*, where all of these elements were tested and found extremely wanting. This situation equally applies within WA, whereby despite the best efforts of agencies, an integrated and mandated system of work continues to be an issue and needs resolution.

5.6.1.2 Ineffective Strategic Resource Planning

A combination of the current situation and a range of issues that clearly presented themselves during the *Perth Hills Fires* without doubt resulted in ineffective and inefficient strategic resource planning. Moreover, safety issues on the fireground, similar to those subject to the *Linton Coronial Inquest* following the death of five CFA volunteer firefighters in 1998, are a significant risk in operating a non-integrated incident management (and communications) structure. It is also contrary to the concepts of operation outlined in *Westplan – Bushfire*.

In situations like those confronted on 5 and 6 February 2011 with multiple large fires in the landscape, potential for further fires and the need to undertake very strategic resource planning, this lack of integration cannot continue to occur. Effective resource planning should:

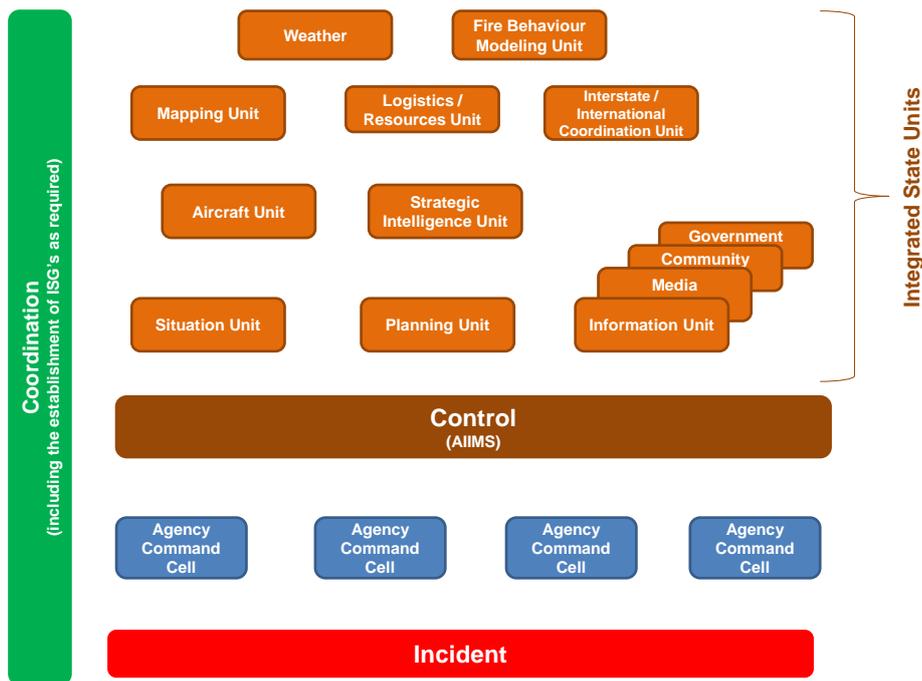
- Encompass all available resources within the State;
- Have regard for time and space issues in deployment;
- Consider an all hazards perspective to planning, including the alignment of resource capability/capacity commensurate with risk/hazard type;
- Provide a level of contingency planning, including consideration of the potential need for interstate and Commonwealth resource support;
- Incorporate the potential long term duration requirements of an incident/s, including business continuity and welfare/fatigue management obligations;
- Forecast impending conditions and ongoing potential.

This cannot occur with agencies operating at a discrete agency level or in isolation from one another.

5.6.1.3 Future Approach

The approach to be adopted by FESA in the future will ensure that FESA, as the HMA on behalf of the State, utilises the available resources (regardless of agency or department) in the most efficient and effective manner possible to achieve a ‘joined up’ outcome for the State. This approach will align specific expertise and experience (regardless of agency or department) to the variety of roles undertaken in incident management and State coordination. The following diagram outlines the core concepts of this proposal:

Figure 5 – Overview of proposed integrated statewide incident management and coordination structure



A plan of the new *State Operations Centre* to facilitate the above is attached as Appendix 19 of the detailed submission. This plan clearly demonstrates the integrated nature of the centre, clear *State Controller* functionality, clear *Agency Commander* functionality and integrated *functional units* within the centre. It also demonstrates the clear division between FESA Metropolitan Region operations arrangements and that of State arrangements, which have not been as clearly demarcated in the current facility and/or modes of operation.

The proposal does not in any way alter individual agencies’ internal *command* responsibilities or activities during emergencies, nor does it impact on the normal roles and responsibilities of land owners/occupiers in bushfire prevention and mitigation, including the role of DEC and its land management responsibilities which include fire as a tool for land management.

However, as soon as it becomes a bushfire then FESA submits the integrated incident management and state coordination arrangements should be activated, whether that be assuming control or shadowing to progressively build the intelligence and situational awareness of the State fire situation/potential. This does not mean that ‘control’ responsibilities of individual agencies will be

automatically be eliminated nor is FESA proposing it should automatically assume 'control' under s 13 of the *Bush Fires Act 1954*, but simply that a robust and agency/land tenure blind approach should be adopted for establishing the most suitable and equipped incident management (State, Region and Incident level) arrangements possible.

In addition to utilising the most appropriate and skilled personnel regardless of agency, this approach will also ensure any subsequent transition of 'control' to FESA under the provisions of s 13 occurs in a more seamless manner, with a multi-agency incident management and single coordination structure already in place.

FESA has initiated discussions with the DEC with respect to them having a permanent presence at the State Operations Centre and administering their Prescribed Burning Program from the Centre. This is seen as truly advantageous not only to facilitate seamless transition of control to the State Centre but also from building a more integrated teamwork perspective through day-to-day activities.

FESA has also initiated discussions with the Bureau of Meteorology (BOM) to locate a severe weather specialist at the State Operations Centre fulltime which will support Prescribed Burning programs, weather forecast (across all hazards), declaration of Total Fire Bans and increased expertise in relation to this extremely important aspect of emergency management. The BOM representative could also train FESA and DEC staff on weather related matters and fully integrate into the overall State Operations Centre team.

This proposal is totally consistent with the findings of the *Victorian Bushfires Royal Commission* which were quite specific about the need to ensure a single line of control existed and removal of any ambiguity in the operational structural arrangements, but is tailored to cater for the WA operating environment.

It is also logical and necessary that this centre be located at the HMA headquarters for it to avail itself of the necessary supporting infrastructure to perform the role effectively. It is also logical that this centre be located at the FESA headquarters, given the high potential and regular occurrence of multiple incidents occurring at the same time from FESA's all hazards operating environment. To isolate the centre in another location would not be effective or efficient and would require additional resourcing to that which can be provided through FESA's existing resource base. Moreover, given bushfire is the only hazard type within the State that has multiple agencies exercising control responsibility, and given the ability for FESA to assume control (s 13 *Bush Fires Act 1954*), it is appropriate that these operations be integrated into the all hazards *State Operations Centre* at FESA.

Of fundamental importance is also the need to ensure Police activities, which include potential terrorism response/coordination, occur at a separate centre which can also perform the role of a *State Crisis Centre* rather than a *State Operations Centre* for non-crime/security related activities. FESA appreciate it will have a support/combat agency function in these types of activities and when this occurs it will also be required to send a liaison officer to the *State Crisis Centre* and link back to its own *State Operations Centre* for FESA command/agency coordination functions. FESA accept similar arrangements would need to be instituted when the Midland Police Operations Centre is operating during Police operations affecting FESA.

This proposed arrangement virtually duplicates the current operating arrangements in Victoria, where they operate a *State Control Centre*, which is where the State Controller (fire or flood undertaken by the Fire Services Commissioner and SES Director Operations respectively) operates.

FESA proposes that the establishment of a *State Fire Control Team* arrangement, similar to Victoria, would be a beneficial addition to the structural arrangements which operate in WA and would assist to facilitate the integration, partnership and input of the key fire services, supported by Police to ensure the *State Emergency Coordinator* functions are truly integrated into this arrangement via a senior Police representative. This would in turn require the Police representative to ensure the SEC (Commissioner of Police) is kept apprised of the current/pending situation and any relevant issues.

In addition to the above, Victoria actually operates four separate centres at State level:

- Fire/Flood Control through the State Control Centre;
- Crime/Security arrangements through the State Police Operations Centre;
- Emergency support/coordination functions through the State Emergency Support Centre; and
- State Crisis Centre for Government/political purposes.

[EMMV 2010:p3-20]¹⁰

In FESA's opinion this is overly complex and alignment of centres as proposed in this section of FESA's submission is far more effective in providing:

- Maintenance of existing *controlling agency* arrangements;
- Certainty of line of control;
- Continuity of management/information;
- Integration and partnership evolution of key services;
- Appropriate separation between crime/security activities and other emergencies at the State level;
- Resource efficiency; and
- Facilitation of the appropriate whole-of-government alignment at the most senior level at the State Crisis Centre.

FESA's proposed arrangement is akin to that which operates successfully in Victoria; whereby there is not one centre operating which is under the control of the Police as the coordinators; rather, separate centres aligned to control of a particular hazard type and coordination.

The proposal to establish an integrated *State Operations Centre* is also supported by the recent *Review of the Ability of the Department of Environment and Conservation to Manage Major Fires* whereby the following comments were prominent in the report:

The reviewer also noted that DEC is establishing a new operations coordination centre at Kensington. FESA are also building a new facility and operations centre at Cockburn Central. The FESA facility will be designed to allow DEC fire personnel to operate from a designated part of the state coordination centre. Given the principle of "unity of command" the question

¹⁰ Emergency Management Manual Victoria, 2010

must be asked: “Is this a missed opportunity to co-locate two important bushfire management agencies?” [emphasis added].¹¹

Case Study

The current situation whereby agencies operate in relative isolation to each other based primarily on land tenure clearly inhibits effective strategic resource management. With the forecast consequences of climate change on the regularity and intensity of fires in the landscape, State coordination arrangements need to clearly cater for the ongoing assessment of fatigue management (for staff and volunteers alike) from an all hazards perspective and include a continual review of contingent capability/capacity to combat new outbreaks/events not only at the time but against forecast weather conditions.

This situation was reflective of the strategic resource challenges confronting agencies during the Perth Hills Fires and the eventual deployment of interstate support. Whether or not this interstate support was necessary to adequately resource the existing fires in the landscape (Red Hill and Roleystone in this context), situational awareness and forecasting for potential new outbreaks and forecast extreme weather over the next period needs to also be considered. It was this combination of factors and the absence of clear knowledge of resource availability across agencies that FESA believes warranted both intra and inter state resource deployment.

The combination of both an integrated statewide capability model and state coordination arrangements in a single State Operations Centre will alleviate these challenges in the future and ensure the State’s overall resources are known and considered ahead of any decision to seek interstate support. Embedding these arrangements will ensure the current and future contingent strategic resource requirements are forecast and assembled in a strategic manner, commensurate with risk and regardless of land tenure and/or number/type of fires and/or other types of emergency events that exist.

¹¹ Ferguson 2010: p.22

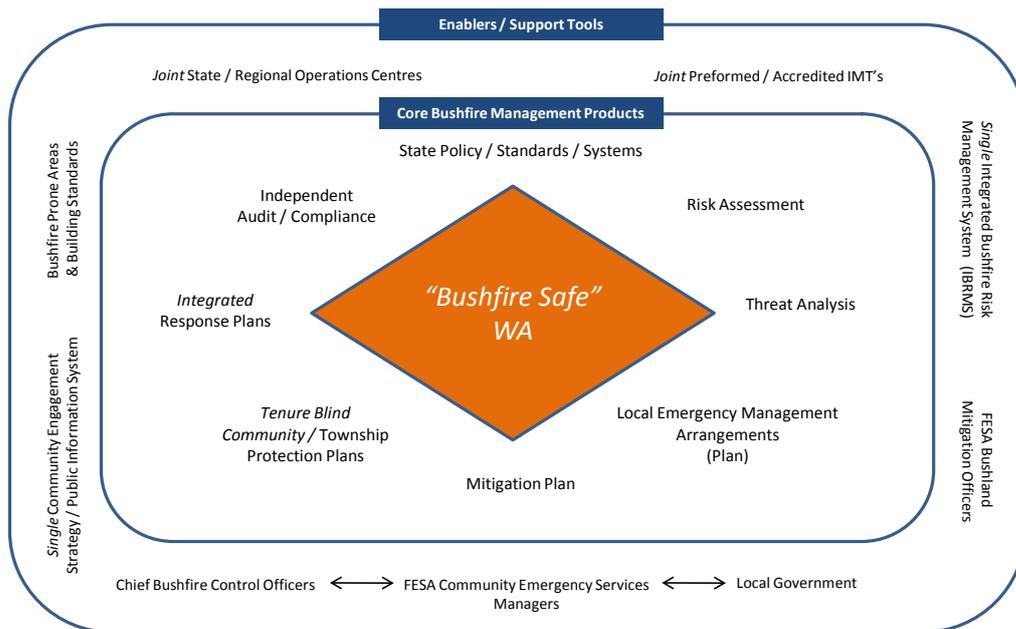
6. SUMMARY

Evidence based detail in support of these key themes and recommendations are contained in the body of the detailed submission. The submission also contains details of the remaining issues not specifically outlined but still relevant for consideration by the Inquiry.

In summary FESA submits the State’s Bushfire Management Arrangements have significantly advanced in recent years with relatively good success in managing this diverse hazard. FESA has learnt a great deal from previous inquiries and made improvements in its ability to manage bushfire across the State. Incremental improvements and changes to legislative frameworks have facilitated these, however in its continual strive for improvement, FESA firmly believes that further step change is now required in the manner bushfire management is delivered within the State.

The following outlines the interrelated systemic arrangements FESA believe will result from its submission, applicable to achieving a *Bushfire Safe - WA*:

Figure 6 – Core elements of FESA proposals for bushfire management “system”



7. ACTIONS ARISING – HEARING WITH REVIEW ON 29 MARCH 2011

As a consequence of the hearing which occurred between the Inquiry and senior FESA representatives on 29 March 2011, a number of follow-up requests were made of FESA. The following outlines the relevant status of these requests and the provision of this information.

Request ¹²	Status	Reference
Copy of FESA's organisation chart	Contained within Submission	s.1.1.3 Appendix 1
Copy of the Major Incident Review – when finalised.	A copy of the completed Major Incident Review will be made available to the Inquiry when completed.	
Information and analysis on types of houses lost and the cause – raw data to be provided now and analysis when it is available.	Contained within Submission	s.1.5.1 Appendix 3 (Confidential not for public release)
Advise the number of people displaced in the (a) Red Hill and (b) Roleystone fires.	Information being provided through the Department of Child Protection (DCP)	
Advise the time FESA was notified the Buckingham Bridge was on fire.	Contained within Submission	s.1.5.1 Appendix 4
Advise when the first fire map was generated.	Contained within Submission	s.1.5.1
Advise the estimated cost of fitting ember protection screens to evaporative air conditioners.	Contained within Submission	s.4.3.8
Copy of the CRC survey instrument.	Contained within Submission	s.4.1.15 Appendix 12&13
Data from the CRC survey when it is available	Contained within Submission	s.4.1.15 Appendix 14
Advise the timing of controlled entries to the fire ground – for the media, and for residents.	Contained within Submission	s.1.5.1
Contact details for the Chief Pilot.	Provided separately via email on 6 April 2011.	
Provide information on prescribed burning in 2010.	Contained within Submission	s.4.8
Confirm whether offers of assistance were received from Pearce Air Base; and what the response from FESA was.	FESA confirms it was not aware of offers of assistance being made from Pearce Air Base for the Roleystone fire. However, it is aware that an offer was made from the Navy, via <i>Volunteering WA</i> , for the Red Hill fire which was declined as additional support of this nature was not required. Support from <i>Perth Aviation Fire and Rescue</i> (Perth	

¹² Request of FESA via email from Belinda Van Seville dated 29 March 2011

	<p>Airport) was deployed and utilised at the Roleystone fire.</p>	
<p>Information on arrangements for de-commissioning FESA vehicles, and their subsequent availability to the public.</p>	<p>FESA provides emergency services appliances through two processes:</p> <p>FESA owned appliances - A rolling capital works replacement program. FESA retains ownership for the service life of these vehicles and arranges recovery and disposal when the vehicle is of no further use to FESA (career and volunteer Fire and Rescue Service and volunteer Emergency Service Units); and</p> <p>Local Government owned appliances - The Emergency Services Levy (ESL) grants scheme. Local governments responsible for Bush Fire Brigades and State Emergency Service Units receive replacement vehicles through this scheme. Ownership rests with the relevant Local Government for the service life of the vehicle. On replacement, ownership transfers back to FESA. Provided the vehicle is of no use to FESA, it is disposed of.</p> <p>Standard Disposal Process Vehicles are disposed of through public auction in accordance with government supply policy and guidelines. In all cases, firefighting equipment, radios, decals and emergency warning systems (beacons and sirens) are removed. In the case of Light Tankers, the appliance tray (tank, pump, lockers) is removed and auctioned separately.</p> <p>Exception to Standard Disposal - Local Disposal In prescribed circumstances, FESA will consider requests by local governments to retain appliances. The circumstances are very specific:</p> <ul style="list-style-type: none"> • Heritage purposes (local museum); • Local community interest in purchasing the appliance; and • Local Government interest in purchasing the appliance. <p>All appliances are disposed of at fair market value and decommissioned which incorporates de-licensing,</p>	

	<p>removal of emergency warning devices (lights and sirens), radio communication equipment and operational equipment. In addition, the CEO of the Local Government is required to certify that:</p> <ul style="list-style-type: none"> • Vehicles are purchased on an “as is” basis with no warranty; • Vehicles will be removed from the state and Local Government asset register; and • Vehicles will not be used/considered as a brigade/unit emergency response or support asset. 	
Contact details for the Chairman of the FESA Board.	Provided separately via email on 6 April 2011.	
Chronology of the Roleystone fire.	Contained within Submission	s.1.5.1 Appendix 4
Arrange a portal viewing – please contact Steve on 9489 3119 to set this up.	Appropriate arrangements for a presentation on the FESA Bushfire Mitigation Portal will be coordinated directly.	Presentation conducted on 12 April 2011

8. SUMMARY OF FESA RECOMMENDATIONS

The following provides a summary of FESA’s recommendations contained within its full detailed submission for consideration of the Review:

FESA RECOMMENDATION		SUBMISSION REFERENCE
STRATEGIC OVERVIEW		
A FESA Overview		
A1	The Review should note and support the principle that FESA has no vested interest, perceived conflict or pecuniary interest in taking on the lead role for bushfire management within the State and has sufficient infrastructure and most importantly state-wide <i>reach</i> into all communities and through its regionally based service delivery model to adequately fulfill this task.	s.1.1.4
A2	The Review should recognise the FESA resource base and unparalleled organisational infrastructure makes it the only agency capable and with the capacity to be the lead agency for bushfire management within the State.	s.1.1.4
A3	The Review should support the <i>FESA 2023</i> plan and its service delivery philosophy with a focus on risk mitigation and community resilience.	s.1.1.5 s.1.1.6
B WA Emergency Management Arrangements		
B1	The Review should recommend the application of the FESA Bushfire Mitigation Portal and associated programs and infrastructure should be the consistent basis upon which LEMA are developed for bushfire across the State.	s.1.2.22
B2	The Review should recommend a similar integrated approach be taken from an all hazards/all agencies perspective to ensure each individual Local Government and the State as a whole is adequately prepared for any potential emergency which may exist across the State commensurate with risk.	
C FESA as a Statutory Authority		
C1	The Review should note the ongoing concerns of key stakeholders, particularly volunteers, with respect to <i>Duty of Care</i> and <i>Responsibility</i> provisions.	s.1.3.
C2	The Review should note FESA’s position, which is supported by legal advice received from the State Solicitors Office, with respect to <i>Duty of Care</i> and <i>Responsibility</i> .	s.1.3.1
C3	The Review should strongly support the retention of appropriate protections for volunteers from personal liability for actions taken to prevent, mitigate and/or control a bushfire.	
C4	The Review should support the retention of the current hierarchy of <i>Responsibility</i> which is posited on primary responsibility residing with the land occupier and/or owner.	s.1.3.2
C5	The Review should note the complexities associated with the current legislative regime affecting bushfire management across WA.	s.1.3.3.
C6	The Review should support the recommendations of the <i>Community Development and Justice Standing Committee Inquiry into Fire and Emergency Services Legislation</i> and note the action being taken to develop a single consolidated emergency services Act and associated facilitative provisions that allow transfer of Bush Fire Brigades administration and operations from Local Government to FESA.	s.1.3
C7	The Review should consider the relevance of the existing enforcement and penalty regimes that operate within WA commensurate with risk and potential consequence.	s.1.3 Table 6 & 8
C8	The Review should note the general absence of Local Government adopting	Table 6

	local laws relevant to bushfire management with only forty-three out of a potential one-hundred and twenty-two Local Governments with local laws in place.	(refer comments against s.41)
C9	The Review should note the City of Armadale have local laws in place at the time of the <i>Perth Hills Fires</i> .	Table 6 (refer comments against s.41)
C10	The Review should strongly recommend that all Local Governments that have a bushfire risk promulgate local laws relevant to their area.	
C11	The Review should note the absence of any formal audit regime to audit compliance with Permit Conditions under reg 15B and recommend that non-compliance should be viewed seriously and attract the more serious level of any enforcement and penalty regime.	Table 7
D Additional Preparedness Commensurate with Prognosis		
D1	The Review should note the seasonal prognosis leading into the 2010/11 fire season and the additional preparedness activities undertaken by FESA.	s.1.4.2
D2	The Review should note the prognosis for the weekend of 5 and 6 February 2011 and the additional preparedness activities undertaken by FESA in preparation for the weekend.	s.1.4.3
D3	The Review should note the identification of a number of issues for improvement that will be pursued by FESA prior to the next fire season.	s.1.4.4
D4	The Review should note the alignment between the issues identified and synergy with FESA's submission.	s.1.4.4
E Perth Hills Fires - Overview		
E1	The Review should recognise the efforts of FESA staff and volunteers, DEC, Local Government and all attending combat and support agencies at the Roleystone Fire.	s.1.5.1
E2	The Review should support the adoption of the <i>primacy of life</i> principle as the overarching strategy and the rationale for adopting this approach.	s.1.5.1
E3	The Review should consistent with the (national) issues existing in other States, note FESA's intention to continue to research and opportunistically adopt improved strategies, after further underpinning research, to identify defensible properties in a more effective manner.	s.1.5.1
E4	The Review should note the information with respect to Buckingham Bridge awareness and strategies adopted.	s.1.5.1
E5	The Review should note the issues associated with the need to further explore: <ul style="list-style-type: none"> o Pre-determination of Incident Control Centres; o Evacuation system (including access to incident ground / re-entry issues). 	s.1.5.1
E6	The Review should maintain confidentiality over the data associated with cause of loss/damage provided to the Inquiry.	s.1.5.1
F Perth Hills Fires - Public Information		
F1	The Review should note the increasing demand and significant advancements in public information management made by FESA over recent years.	s.1.5.3.4
F2	The Review should recognise the professionalism and commitment of FESA staff and volunteers efforts in gathering and circulating timely information during a period of intense public scrutiny and demand during the <i>Perth Hills Fires</i> .	
F3	The Review should note the role of FESA in providing public information services to support DEC and Local Government in recent years and the pivotal role FESA plays in this regard as the overarching HMA for bushfire.	s.1.5.3.4
F4	The Review should note the intention of FESA to continue to improve on public information activities, particularly the appropriate use of social media and a further integrated approach as a unit within the <i>State Operations</i>	

	<i>Centre.</i>	
F5	The Review should recognise the demonstrated robustness of the FESA public information system and how it held up well under unprecedented pressure.	
G	Previous Inquiries Overview	
G1	The Review should note the consistencies in subject matter between Inquiries/Reviews conducted nationally and more importantly within WA.	s.1.6.1
G2	The Review should note the synergies between the findings and recommendations of several Inquiries/Reviews and the contents and submissions made by FESA in relation to significantly improving bushfire management within WA.	s.1.6.1
H	Victorian Bushfires Royal Commission	
H1	The Review should note the establishment of a system by FESA to assess the relevance and the status of the <i>Victorian Bushfires Royal Commission</i> outcomes in FESA.	s.1.6.2
H2	The Review should note the status of the <i>Victorian Bushfires Royal Commission</i> outcomes and considers this status in evaluating the outcomes and recommendations arising from the Review.	Appendix 8
I	STRUCTURAL REFORM TO ACHIEVE A SEAMLESS AND INTEGRATED BUSHFIRE SAFE - WA Nomination of a Single Agency Responsible for Bushfire Management within WA	
I-1	The Review should note and acknowledge the work done by individuals, organisations and IBMC in continually improving the State's bushfire management arrangements.	s.2.1.1
I-2	The Review should support the ongoing integrity of the integrated "umbrella structure" of FESA and its underlying philosophy and ethos.	s.2.1.1
I-3	The Review should support FESA's position that structural change is necessary to maintain the momentum and catalyst for change to the State's bushfire management arrangements.	s.2.1.1
I-4	The Review should support FESA's position that there is an identified need for a single authoritative mandated approach to bushfire management within the State to achieve true interoperability/integration between agencies and long term and sustainable change for the future.	
I-5	The Review should note that FESA has implemented a solution which has started to reduce the risk of bushfire in partnership with Local Government and the community.	s.2.1.2
I-6	The Review should recognise that any structural reform options considered by the Review must not only have regard for these successful programs but also build upon them for the future.	s.2.1.2
I-7	The Review should consider the models recommended by FESA and the evaluation of each.	s.2.1.3
I-8	The Review should recommend to Government the FESA preferred options for structural change.	s.2.1.3
J	Single Bushfire Management Policy, Planning, Systems and Mitigation Activities	
J1	The Review should support the need for standardised single bushfire management, policy, planning, systems and mitigation activities for WA.	s.2.2
K	Clear Lines of Accountability	
K1	The Review should recommend that a clear accountability model be established for each element of the overall bushfire management system, which can withstand scrutiny and not be the subject of confusion and disputation during preparation for or in times of emergency.	s.2.3
L	Management of Unallocated Crown Lands (UCL) and Unmanaged Reserves (UMR)	
L1	The Review should note the current arrangements for fire management on UCL and UMR and its inherent issues.	s.2.4
L2	The Review should note FESA's significantly increased capability to	s.2.4

	support/undertake fire management on UCL and UMR.	
L3	The Review should note FESA's willingness to review the current division of responsibility and provide additional support to the management of UCL/UMR in a collaborative manner between the relevant partners (RDL, DEC and FESA).	s.2.4
STRATEGIC CAPABILITY BUILDING		
M	Statewide capability Model	
M1	The Review should support FESA's position that planning for and building of <i>State-wide Capability</i> for bushfire (and for that matter any other hazard type) should be done at an integrated statewide level, under the auspices of the responsible HMA for a particular hazard, in the case of bushfire this being FESA.	s.3.1
M2	The Review should support FESA's proposed capability model as the basis of <i>State-wide Capability</i> planning.	s.3.1.1
M3	The Review should strongly recommend to Government that they require DEC to integrate capability requirements, including the outcomes of the recent <i>Review of the Ability of the Department of Environment and Conservation to Manage Major Fires</i> into a global state-wide approach, using the IBMC as the current appropriate avenue to progress these deliberations.	s.3.1
N	Whole-of-Government Resource Coordination System	
N1	The Review should note the proposed FESA whole-of-government networked resource coordination system concept.	s.3.2
N2	The Review should recommend to Government that it supports FESA in developing and administering this concept for the State.	s.3.2.1
O	Structured Recognition and Use of Local Knowledge and Structured Incident Management Accreditation System	
O1	The Review should support the importance of integrating local knowledge into all levels of the incident management structure.	s.3.3.1
O2	The Review should require the agencies to adopt a requirement that local knowledge, regardless of land tenure, be integrated into incident management structures as much as practicable given the availability of and resourcing priorities.	s.3.3.1
O3	The Review should support the continued use of AIIMS as the State incident management structure for bushfire.	s.3.3.2
O4	The Review should note the complexities associated with an incident management system accreditation system.	s.3.3.2
O5	The Review should note the intention of FESA and DEC to introduce a joint incident management accreditation system prior to the 2011/12 fire season.	s.3.3.2
O6	The Review should support the FESA proposed principles for an incident management accreditation system.	s.3.3.3
O7	The Review should note the critical capability forecasts for senior incident managers within the State.	s.3.3.2
O8	The Review should recommend to Government that they need to make resources available to the agencies in order to urgently develop a joint succession and development plan to address the critical forecast shortfall in senior incident management personnel.	
P	Enhancing Volunteerism	
P1	The Review should recognise the significant contribution of volunteers in the <i>Perth Hills Fires</i> and more generally to the overall safety of the WA community.	s.3.4.1
P2	The Review should recognise the evolution of volunteer support activities within FESA and the successes of these initiatives / programs.	s.3.4.2-3.4.17
P3	The Review should recognise the existence of a <i>Volunteer Charter</i> and carefully consider the potential impact on volunteers of any recommendations it might make to Government as a consequence of this	s.3.4.2

	Review.	
P4	The Review should strongly recommend to Government that FESA is the most appropriate agency to continue to coordinate emergency service volunteers within WA.	s.3.4.21
P5	The Review should encourage Government to work directly with FESA to explore future opportunities to support emergency service volunteers, including as necessary advocacy to the Commonwealth Government for additional support arrangements.	s.3.4.21
COMMUNITY FIRE SAFETY PLANNING		
Q	Building Engaged and Active Fire Safe Communities	
Q1	The Review should recognise that FESA has proactively been modifying and evolving its service delivery model to ensure it maximises the opportunities to engage with the community, including the progressive growth in Bushfire Ready Facilitators.	s.4.1
Q2	The Review should strongly support that <i>primacy of life</i> is treated as the first and highest priority in all of FESA’s operational and community engagement strategies and decision making, and is a core element of the Prepare Act Survive communications strategy developed by FESA based on the National Bushfires and Community Safety Position.	s.4.1.3
Q3	The Review should note FESA’s acknowledgement that is inevitable that a focus on the protection of life over property will lead to additional property loss, particularly where decisions have been made to relocate or evacuate people who may otherwise choose to stay and defend their property.	
Q4	The Review should support the <i>FESA Community Engagement Framework</i> , including its 5 year term, developed in accordance with the <i>FESA 2023 Shaping Our Future Strategy</i> .	Appendix 10
Q5	The Review should note the adoption of the national position and the incremental achievement in implementing this position within WA including the number of challenges and work to be undertaken to achieve full compliance with this position (e.g. shelters).	s.4.1.3
Q6	The Review should note the specific status of resources applied to the areas affected by <i>Perth Hills Fires</i> (currently six Bushfire Ready Facilitators and approximately 75 Street Coordinators in Roleystone, Kelmscott and surrounding areas within the City of Armadale, including three Facilitators specifically covering Roleystone).	s.4.1.4
Q7	The Review should note the earlier activation and increased community engagement activities commensurate with the seasonal prognosis and timing.	s.4.1.5 s.4.1.6
Q8	The Review should note the anecdotal evidence from relatively early incidents such as Karnup on 30 November 2010 and Gooseberry Hill on 13 December 2010 that suggests many residents were not as well prepared due to the early commencement of the season.	s.4.1.6
Q9	The Review should recommend to Government that it considers the current resourcing constraints, community expectations and future demands on providing contemporary community engagement activities before, during and after an emergency event and place a priority in future budgets to increase resourcing to this important issue, which will also support and alleviate any additional burden being placed on volunteers.	s.4.1.16
Q10	The Review should recognise the effectiveness of the programs and strategies and acknowledge the efforts of volunteers to date.	s.4.1.16
Q11	The Review should support FESA’s initiation of specific research in partnership with the Bushfire CRC to inform future programs and strategies.	s.4.1.14 s.4.1.15
Q12	The Review should recommend to Government that all bushfire management activities <i>must</i> be treated as an end-to-end system and not isolated activities within the PPRR continuum or based on a land tenure basis.	
Q13	The Review should note that behaviour change is a challenging process that has been well researched through the Bushfire CRC <i>C2 Project</i> , which showed	s.4.1.17

	it requires a significant investment in time and resources over an extended period of time.	
Q14	The Review should support FESA's position that these issues a long term culture change at both organisational and community level.	s.4.1.17
Q15	The Review should note that FESA's website is coordinating and handling the increased traffic well and that final redevelopment will be completed in the first half of 2011.	s.4.1.13.1
R	Fire Hydrant Ownership	
R1	The Review should note the current arrangements applicable to fire hydrant ownership in WA, its uniqueness, the recommendations of the <i>Community Development and Justice Standing Committee</i> and the inability to progress this issue with the water providers.	s.4.2
R2	The Review should recommend the ownership and associated maintenance of fire hydrants should transfer to water providers as a matter of urgency.	s.4.2
R3	The Review should recommend FESA's role with respect to fire hydrants include routine and scheduled inspection with follow-up reports provided to the water provider for rectification of any observed faults.	s.4.2
S	Planning and Construction in Bushfire Prone Areas	
S1	The Review should note the partnership between FESA and the Department of Planning and the progress they have achieved through the <i>Planning for Bushfire Protection (Edition 2) – Interim Guidelines</i> , together with the proposed review of these guidelines following the outcomes of the <i>Victorian Bushfires Royal Commission</i> .	s.4.3.1
S2	The Review should note the partnership between FESA, the Department of Planning and the Building Commission Division of the Department of Commerce to develop a submission on legislative reform options for the 'declaration of bushfire-prone areas' for consideration by Cabinet.	s.4.3.6
S3	The Review should explore the issues raised by local governments which act as disincentives to the incorporation of bushfire protection guidelines into local planning laws (e.g. potential for increased liabilities, lowering property prices, insurance issues and potential developers viewing the imposition of additional construction standards as a disincentive to invest in their area).	s.4.3.3
S4	The Review should explore any potential 'gap' that may exist in insurance premiums applicable to those affected by the recent fires and work with insurance companies and the State Government to overcome these potential impediments to rebuilding in accordance with <i>best practice</i> bushfire protection methods for the future.	s.4.3.7
S5	The Review should support FESA's position that these issues need to be fully understood and should not in themselves override responsible planning laws that are premised on the <i>primacy of life</i> principle.	s.4.3.7
S6	The Review should recommend to the State Government the need for legislative reform to: <ul style="list-style-type: none"> o adequately incorporate the bushfire protection measures as State development requirements rather than guidelines; and o more consistently identify and declare areas that are bushfire prone. 	s.4.3.6
S7	The Review should recommend to the State Government the retrospective application of planning and construction standards as part of the legislative reform program.	s.4.3.7
S8	The Review should absent of recommending legislative reform, recommend to the State Government that they press local governments to urgently adopt the <i>Planning for Bushfire Protection</i> guidelines within their local planning laws for both rebuilding in areas recently impacted by fires and for future developments.	s.4.3.6 s.4.3.7
S9	The Review should recommend to the State Government that FESA be the responsible authority to work in partnership with the Department of Planning	

	to determine State-wide policy and standards applicable to defining and building in bushfire prone areas.	
S10	The Review should note the issues associated with evaporative coolers and consider this in the context of future building standards and planning regimes.	s.4.3.8
T	Critical Water Infrastructure Protection	
T1	The Review should note the work undertaken by FESA and the Water Corporation and its clear benefit to protection of critical water infrastructure during the recent <i>Perth Hills Fires</i> .	s.4.4
T2	The Review should strongly recommend to the State Government that all water authorities and other departments responsible for critical infrastructure in designated bushfire prone areas be directed to engage with FESA to establish a joint mitigation program as part of their business continuity plans.	s.4.4.3
T3	The Review should strongly recommend to the State Government that a building protection zone is implemented at all DEWS sites as a matter of urgency.	s.4.4
T4	The Review should recommend to the State Government that it fund FESA to undertake this critical infrastructure mitigation program on an ongoing basis as part of its <i>Integrated Bushfire Risk Management System</i> .	
U	Embedding the “primacy of life” principle	
U1	The Review should recommend the adoption of the <i>primacy of life</i> principle in all mitigation and incident management plans and priorities, regardless of land tenure.	s.4.5
V	Evolution of bushfire planning into township protection/community level plans	
V1	The Review should recommend the establishment of a new fire management planning framework that supports end-to-end tenure blind planning and fully engages the community.	s.4.6
V2	The Review should recommend the establishment of priority plans for very high and high risk areas.	s.4.6
W	Bushfire Risk Management in Indigenous Communities	
W1	The Review should note FESA’s vision for working with indigenous communities and the achievements to date.	s.4.7
W2	The Review should recommend to Government that it fully supports FESA’s initiatives to engage and work directly with indigenous communities across WA.	s.4.7
W3	The Review should consider this issue in making any recommendations relevant to responsibility for UCL and UMR.	s.4.7
X	Prescribed Burning / FESA Integrated Bushfire Risk Management System (IBRMS)	
X1	The Review should note the response to its request for further information arising from the hearing held on 21 March 2011.	s.4.8
X2	The Review should recommend to Government the adoption of the <i>FESA Integrated Bushfire Risk Management System (IBRMS)</i> underpinned by the <i>Bushfire Threat Analysis</i> methodology as the basis for all bushfire mitigation planning and reporting into the future.	s.4.8.1 Presentation (12/04/11)
X3	The Review should recognise and promote through the Inquiry the Winter Burning Program initiative established by FESA as a means of bushfire mitigation by private landowners.	s.4.8.7
	UNIFIED CONTROL	
Y	Integration of Agencies within Single State Operations Centre	
Y1	The Review should note the issues arising during the <i>Perth Hills Fires</i> .	s.5.1.2
Y2	The Review should require agencies to fully integrate incident management personnel into a single Incident Management Team and the appropriate level	s.5.1.3

	of representation at all levels of the State's arrangements, in accordance with the principles of AIIMS, <i>Westplan – Bushfire</i> and State policy.	
Y3	The Review should require agencies to adopt the joint pre-formed incident management structures for all future planning and deployment, in accordance with the preparedness triggers outlined in State plans and policy arrangements.	s.5.1.4
Y4	The Review should note the situation which operates in Victoria and the synergies to the FESA proposals and aligned outcomes.	s.5.1.5
Y5	The Review should recommend the establishment of a single <i>State Operations Centre</i> (for all non-crime based operations) located at FESA Emergency Services Complex.	s.5.1.5
Y6	The Review should support FESA's intention to: <ul style="list-style-type: none"> o Implement a fully integrated approach to State level operations in its new <i>State Operations Centre</i>; o Establish a State Fire Control Team (SFCT) to support integration and its State HMA functions for fire. 	s.5.1.5
Y7	The Review should recommend that DEC fully integrate their emergency operations and prescribed burning coordination activities into this centre and cease all independent activities at their own centre/s.	s.5.1.5
Y8	The Review should recommend to the Bureau of Meteorology that they appoint a fulltime severe weather specialist to operate out of the new <i>State Operations Centre</i> .	s.5.1.5
Y9	The Review should note the absence of pre-determined incident control centres and the intention to examine this issue further in consultation with all relevant stakeholders.	s.5.1.5
Z	Strategic intelligence management, including public information and use of social media	
Z1	The Review should note the advancements of integrating strategic intelligence, including the appropriate use of social media, into the overall incident management structure and FESA's position on this issue.	s.5.2
Z2	The Review should recommend to Government that it support FESA in the ongoing development of this concept.	
AA	Clarity in definition around command, control and coordination	
AA1	The Review should recommend to the <i>State Emergency Management Committee</i> that they: <ul style="list-style-type: none"> • Urgently confirm the definitions of 'command', 'control' and 'coordination' in Operational Management Policy 4.1; • Clarify what term is to be used between 'District' and 'Region' to be defined in Operational Management Policy 4.1. 	s.5.3
AB	Access to the Incident Ground	
AB1	The Review should note the complexities involved in this issue and support FESA's position that access and/or re-entry to the incident ground must be posited on safety.	s.5.4.1 s.5.4.2
AB2	The Review should support the proposed ongoing review by FESA with respect to a <i>safe system of work</i> and associated procedures to accommodate the interests of the <i>controlling agency</i> and those of persons with a pecuniary and/or other interest in accessing the incident ground.	s.5.4.2



Government of Western Australia
Fire & Emergency Services Authority



FESA House 480 Hay Street, PERTH WA 6000
Postal Address: GPO Box P1174, PERTH WA 6844
Phone: (08) 9323 9300 Fax: (08) 9323 9384
Email: fesa@fesa.wa.gov.au
Web: www.fesa.wa.gov.au