

**To: The Chair: Air Chief Marshal Mark Donald Binskin (AC) (Retd), The Honourable Dr Annabelle Claire Bennett AC SC, and Professor Andrew Kerr Macintosh**

In Response to: Royal Commission in to 2019-20 Australian Bushfires – Terms of Reference dated 20 February 2020 – Letters of Patent Number 55 under the Constitution of the Commonwealth of Australia.

- a. Responsibilities of and coordination between the Commonwealth, State, Territory and Local Governments relating to preparedness for, response to, resilience to and recovery from disaster events and how to improve arrangements including resource sharing.
- b. What actions should be taken to mitigate the impact of natural disasters and whether preparedness, resilience and recovery should be enhanced.
- c. Should the Australian legal framework change to involve the Commonwealth in responding to national emergencies.
- d. Any relevant matter incidental to the matter referred to.
- e. Findings and recommendations of other reports that are relevant to avoid duplication.
- f. How to achieve greater national coordination and accountability through common standards, rule-making, reporting and data sharing with respect to preparedness and resilience including
  - i. Land management and hazard reduction
  - ii. Wildlife management and conservation including biodiversity, habitat protection and restoration
  - iii. Land-use planning, zoning and development approval, urban safety and incorporation of natural disaster considerations
- g. How traditional land and fire management practices could improve resilience
- h. Mechanisms to facilitate the timely communication of information and
- i. Information sharing for other inquiries or reviews

**To: Parliament of Australia, Parliamentary Committee, Chair Mr Ted O'Brien (MP) and Deputy Chair Mr Josh Wilson (MP)**

Committee resolution 5 December 2019

Responses to be received by Tuesday 31 March 2020

Member(s) Mrs Bridget Archer MP, Mr Josh Burns MP, Hon Dr David Gillespie MP, Ms Zali Steggall OAM MP, Mr Rick Wilson MP, Mr Trent Zimmermann MP

Inquiry into the efficacy of part and current vegetation and land management policy, practice and legislation and their effect on the intensity and frequency of bushfires and subsequent risk to property, life and the environment. Regarding

- Past and current practices of land and vegetation management
- Is current legislation and regulation in conflict or causes confusion for landowners
- The science and research behind activities such as hazard reduction burning, clearing and rehabilitation
- Legislative capability at local, state and federal levels requiring landholders to reduce fire risk on their properties
- The impact of severe fires on the economy in urban, regional, rural and remote areas

- The progress and implementation of mitigation strategies recommended in state reviews over the last decade and
- The role that emergency services have working with land management officials in managing fire risk

**To: The lead independent investigator: Inspector General for Emergency Management (IGEM), Tony Pearce**

Established 14 January 2020

Inquire into the following matters:

- Effectiveness of emergency management command and control and Victoria's operational response
- Effectiveness of the declaration of a state of disaster
- Timeliness and effectiveness of activation of Commonwealth assistance and resource availability
- State evacuation planning and preparedness process and practices
- Preparedness ahead of the 2019-20 fire season
- Effectiveness of immediate relief and recovery work and arrangements, and the creation of Bushfire Recovery Victoria, the National Bushfire Recovery Agency and how they work together

Narelle Campbell

I disclose a **perceived potential conflict of interest**. I am employed by the Victorian Government [REDACTED]. My employment and role bear no relation to any inquiry or commission or to this submission. I submit to these inquiries and commission in my capacity as a private citizen living outside the urban growth boundary of metropolitan Melbourne, in rural Victoria in an area covered by a Bushfire Management Overlay. I made a submission to the Victorian Bushfire Preparedness inquiry and was called in to present to this inquiry in person. The views I express are my own views informed by personal experience, evidence, research and reviewing publications and literature, all of which are Australian, spanning a period of more than 80 years. I have referenced these at the end of each section of this submission for the information and use of the inquiry.

I live with my family in the suburb of Christmas Hills, in rural Victoria. We live on 12 acres of mixed pasture and bushland. Parts of Christmas Hills were impacted in the 2009 bushfires. Our local government area is Nillumbik, a mixed urban/rural shire where about 80 per cent of the population live in the urban area which constitutes about 20 per cent of the land mass of the shire. Rural Nillumbik and urban North Warrandyte is considered one of the most bushfire prone heavily populated places in the world. I make this submission on behalf of my family.

My submission in summary to the inquiries and commission is:

I have learned two fundamental lessons in considering planning for natural disaster in a bushfire prone landscape (noting that I have lived in such a landscape for almost 90 per cent of my life). These are:

1. **prevention is better than cure** and
2. **rural Victorian interests are not protected and served by current land management planning and practice.**

It seems to me that these lessons are fundamental principles of rural risk and emergency management planning and are not acknowledged or acted upon. From a rural perspective it seems that our natural connections to land, which form part of our identity, are ignored by those responsible for land management. The rationale supporting this thinking is:

- Weather includes fire, flood, hail, wind, heat and cold – its variability is a constant in the rural Victorian landscape that we live in. Rural resident communities understand and acknowledge weather and its extremes. **In rural areas it is important to plan and act to minimise the effects of extreme weather.**
- Significant state and national infrastructure are also located in rural areas. It includes significant water storage/treatment and transfer, power generation and transfer, food growing and manufacture, transport, national security and other infrastructure. In rural areas it is important to plan and act to minimise the effects of:
  - extreme weather on this infrastructure, and

- failure of this infrastructure and consequent effects on immediate local areas.
- In rural areas, weather extremes and infrastructure failures by themselves are not necessarily disaster events. **Disaster events occur when action to minimise the effects of these events does not occur.**
- Disaster events are usually fire events. Emergency services cannot extinguish them.
- In rural Victoria, we understand that the **risk, severity and frequency of disaster events can be minimised**, it can-not be eliminated.
- In Victoria, government has been inquiring into what is required to minimise the risk, severity and frequency of disaster events in rural Victoria for more than 80 years. The fundamental findings of these inquiries have been consistent over this time and many findings have not been actioned and implemented.
- Where minimisation and prevention activity does not occur, direct risks to rural Victorian lives, homes, assets, livelihoods, flora and fauna, including native flora and fauna and high value biodiversity are realised. Risk realisation in rural areas can impact urban communities.
- Recent disaster events in rural Victoria include:
  - Black Saturday – bushfires burned across Victoria from 28 January to 14 March 2009. Directly resulted in 173 deaths, 4,600 homes, more than 3,500 other buildings destroyed, and 430,000 hectares burned resulting in the death of significant flora and fauna including vulnerable species. Smoke haze impacted metropolitan Melbourne.
  - La Trobe Valley bushfire and Hazelwood Mine Fire – fire burned through February and March 2014. Contributed to higher than expected local death rate, presentation and admission to hospitals and adverse health effects locally. Smoke haze impacted metropolitan Melbourne.
  - Wye River/Separation Creek – fire on Christmas Day in December 2015 burned 116 homes and holiday houses and 2,500 hectares.
  - Black Summer – bushfires burned across (mainly) south eastern Victoria. At February 2020 the direct impact of these fires includes 5 deaths, 396 homes, many more buildings, 1,500,000 hectares of land and significant flora and fauna including vulnerable species. Fire in Victoria’s Alpine areas (for the third time since 2003) can reasonably be expected to change the biodiversity of these areas. Smoke haze impacted metropolitan Melbourne.
- In rural Victoria, the **Department of Environment Land Water and Planning (DELWP) is currently responsible for minimising the risk, severity and frequency of disaster events occurring.**
  - on public rural lands this responsibility includes meeting recommended risk minimisation targets of no less than 5 per cent per annum across rural Victoria. These targets have not consistently been met over the period 1939 to February 2020.
  - on private rural lands this responsibility includes the development and management of regulatory control exercised through the Victorian Planning Scheme. The scheme has the dual effect of:
    - limiting rural resident action to minimise the risk severity and frequency of disaster events occurring and impacting on private rural land; and
    - creating housing, social, economic and environmental insecurity across rural Victoria in the event disaster events do occur.

- The ongoing frequency and severity of disaster event occurrence in rural Victoria leads me to conclude DELWP is failing to appropriately discharge public and private rural land management responsibilities.
- Planning and acting to minimise the risk, severity and frequency of disaster events occurring in rural Victoria means dealing with complex and multi-faceted issues. **Rural people are directly affected** by them. Issues for rural residents include safety, family, survival, livelihood, health, mental health, human rights, property rights, self-determination, sustainability, expectation, social, economic and environmental considerations. **Urban people are comparatively indirectly affected** by them and are generally at a physical, personal and economic arms-length. Their issues include ideological, social, economic and environmental considerations. **For government all issues compete** for priority within a political context. In our democracy rural communities own, manage and live in proximity to more than 80 per cent of Victoria's land mass, represent approximately 20 per cent of Victoria's population and are an electoral minority. It often feels like rural issues appear subservient to urban considerations for political expedience.
- Rural Victorian land legislation, regulation, policy, frameworks and action planning does not appear to appropriately consider rural Victorian people, assets, livelihoods, needs, priorities, human rights, safety, flora, and fauna together. It is not clear if this is a culture or capability limitation of DELWP and Local Government. It is also not clear if this could be perhaps the result of DELWP having a workforce that is **predominantly urban in seniority, composition, location, content and focus**, with limited direct experience of and connection to rural land and rural issues, and what is required to manage it for safety and sustainability.
- It is important in future rural Victorian public and private land management acknowledges rural context and appropriately prioritises, measures, plans, resource, acts and reviews management activity to minimise the frequency and severity of disaster events in rural Victoria. A great time to start this would be now. A great way to start would be to explore alternatives to the current DELWP and Local Government model, which has been demonstrated to fail rural Victorians, lands, assets, flora and fauna.

If there is any doubt about the validity of this type of thinking – perhaps try to place yourself in the shoes of a rural Victorian in the lead up to the fire season each year. Alternatively, it may be more helpful if you exchange Emergency services capacity for Hospital isolation capacity – and then exchange to extinguish a catastrophic fire event with the term where Covid19 is widespread in the population. There are finite emergency responders in rural Victoria where risk is realised, and those resources have limited capabilities. Preventing and minimising these events in the first instance is prudent.

References include:

[http://royalcommission.vic.gov.au/finaldocuments/summary/PF/VBRC\\_Summary\\_PF.pdf](http://royalcommission.vic.gov.au/finaldocuments/summary/PF/VBRC_Summary_PF.pdf)

<http://www.royalcommission.vic.gov.au/getdoc/5bc68f8a-a166-49bc-8893-e02f0c3b37ab/VBRC-Final-Report-Recommendations.pdf>

<http://hazelwoodinquiry.vic.gov.au/>

[https://www.parliament.vic.gov.au/images/stories/committees/enrc/bushfire\\_inquiry/Submissions/Inquiry\\_into\\_the\\_impact\\_of\\_public\\_land\\_management\\_practices\\_on\\_bushfires\\_in\\_Victoria.pdf](https://www.parliament.vic.gov.au/images/stories/committees/enrc/bushfire_inquiry/Submissions/Inquiry_into_the_impact_of_public_land_management_practices_on_bushfires_in_Victoria.pdf)

[https://www.parliament.vic.gov.au/images/stories/committees/SCEP/Fire\\_Season\\_Preparedness/Report/EPC\\_58-11\\_Text\\_WEB.pdf](https://www.parliament.vic.gov.au/images/stories/committees/SCEP/Fire_Season_Preparedness/Report/EPC_58-11_Text_WEB.pdf)

<https://planning-schemes.delwp.vic.gov.au/>

<https://planning-schemes.delwp.vic.gov.au/schemes/nillumbik - particularly clauses 21.03, 35.06, 63>  
<https://vpssc.vic.gov.au/wp-content/uploads/2019/04/Statistical-Compendium-State-of-the-Public-Sector-In-Victoria-2017-2018.pdf>

Rural Victorian public and private land management programming does not, and must, concentrate all legislation, regulation, policy, programming and action towards minimising the risk, severity and frequency of disaster events occurring. If this is to occur, regardless of the complexity of context and competing priorities and capabilities, it will need to explore:

1. Prioritisation
2. Measurement
3. Planning
4. Resourcing
5. Action and
6. Review

## **1. Prioritisation**

The primacy of human life has been articulated as the driving priority of government action in rural Victoria since the 2009 Victorian Bushfire Royal Commission report was released in 2010. This is appropriate. We are a human society.

To prioritise people, this fundamental must embraced and meaningfully embedded in rural Victorian public and private land legislation, regulation, policy, frameworks and plans administered by government (in Victoria this is the responsibility of DELWP).

Public and Private land management legislation in rural Victoria does not currently include the terms “human rights”, “primacy of human life”, similar terms, or consideration of people. Unsurprisingly, legislation, regulation and documents that provide for the management of rural Victorian land does not have the effect of prioritising the life, family, community, assets and livelihood of 1.5 million people living in rural and regional Victoria. There is no articulation or clarity on the structure, relative importance, weighting or rationale supporting public or private land management. When planning to minimise the frequency and severity of disaster events, public and private land management priorities should include:

- People who live there
- Private homes, outbuildings, accommodations, businesses, commerce and equipment
- Private livestock and pets
- Public buildings, parks, roads, infrastructure
- High value biodiversity and endangered flora and fauna and
- Medium value biodiversity and flora and fauna.

These priorities should be articulated, included in the Victorian Planning Scheme, the Planning and Environment Act and the Flora and Fauna Guarantee Act as priorities. This can be reasonably expected to ensure public and private land management in rural Victoria is better directed towards supporting:

- Those directly impacted upon by disaster events,
- Empowerment, self-determination and resilience in rural Victorian communities
- Economic sustainability in rural Victoria

- Protection of endangered species and high value biodiversity and conservation and management of medium value biodiversity and
- Communities indirectly impacted upon by disaster events

Climate change forecasts predict an increase in the frequency and severity of extreme weather events. This makes prioritisation time critical so that those responsible for public and private land management have robust, clear and definitive direction. It provides guidance for the development of measures, plans, resources and actions to minimise the frequency and severity of disaster events across rural Victoria.

Currently rural human priorities, life and risk is absent from many DELWP areas of responsibility. Examples of these impacting this submitter personally are:

1. The DELWP review of the *Flora and Fauna Guarantee Act* in 2017 purposefully **excluded from scope** consideration of people, safety, asset security, and bushfire planning.
2. Nillumbik Council changed the Nillumbik Planning Scheme in 2014 without consultation. Changes were substantive and had the effect of creating housing insecurity for 75 per cent of all rural Nillumbik families (more than 10,000 people) if homes and outbuildings are lost in a disaster (or other) event. This appears to be a perversion of law.
3. Bushfire Management Overlay provisions updated in 2019. Continue to allow for 10m tree clearance around homes built before 2009 - scientific evidence supporting this measure improving safety is unknown. Science supports a safe radiant heat distance in major bushfire (disaster) events of between 100 and 300m.
4. Roadside maintenance practice in rural Nillumbik is limited to minimal "box clearance" near power lines. Falling trees routinely block thoroughfares in weather events and roads quickly become unpassable in disaster events.

It appears to me minimising the frequency and severity of disaster events in rural Victoria requires all land management to focus on preparing public and private land for this purpose. Establishing priorities assists rural Victoria to focus prevention activity.

References include:

<https://www.legislation.vic.gov.au/in-force/acts/charter-human-rights-and-responsibilities-act-2006-11/013>  
<http://www.royalcommission.vic.gov.au/getdoc/5bc68f8a-a166-49bc-8893-e02f0c3b37ab/VBRC-Final-Report-Recommendations.pdf>  
<https://www.legislation.vic.gov.au/in-force/acts/planning-and-environment-planning-schemes-act-1996-5/005>  
<https://www.legislation.vic.gov.au/as-made/acts/flora-and-fauna-guarantee-amendment-act-2019>  
<https://www.legislation.vic.gov.au/in-force/statutory-rules/flora-and-fauna-guarantee-regulations-2011-1>  
<https://www.planning.vic.gov.au/schemes-and-amendments/browse-planning-scheme/planning-scheme?f.Scheme%7CplanningSchemeName=Nillumbik>  
[https://engage.vic.gov.au/download\\_file/4277/501](https://engage.vic.gov.au/download_file/4277/501)

## 2. Measurement

Having established priorities for the management of rural Victorian land to minimise the frequency and severity of disaster events, developing priority measures as part of programming is important. Currently it is difficult to ascertain where, if and how the Victorian government and DELWP report the extent to which they minimise risk as part of discharging land management responsibilities in rural Victoria. Existing published information does not make clear that risk minimisation is a priority or purpose of DELWP.

Current measurement targets appear inadequate and are not met. They include:

- The Bushfires Royal Commission Implementation Monitor and then the Inspector General for Emergency Management were responsible for monitoring recommendations from the 2009 Bushfire Royal Commission recommendations. The initial report made 67 recommendations and 300 actions. Government committed to implementing all of them. Subsequent reporting indicates many actions were never completed and have never been adopted - the rolling 5 per cent per annum prescribed fuel reduction on public land is one of the most notable.
- Residual Fire Risk state-wide 70 per cent target – The imperative for this target is unknown. Each of the most recent Victorian bushfire disaster events in the summary (above) occurred when residual fire risk across Victoria was below this target. This indicates the target is too high and fails to minimise the risk of disaster events occurring.
- Victorian Planning Provisions 10/50/4/2009 Rule – The science supporting this ruling and the safety improvement it provides is unknown.
- Target of 5 per cent of public land to be treated/preventative burning annually – Each disaster event inquiry/Royal Commission since 1939 has recommended reducing the risk to rural communities and environments by reducing fuel by a minimum of 5 per cent per annum. This minimum action has rarely occurred, and not in consecutive years. Of the 7.7 million hectares of public land in Victoria, approximately 130,000 hectares, or 1.7 per cent is treated annually (2014-2019). Considering climate change predictions, 5 per cent appears inadequate, but regardless, 1.7 per cent is demonstrated to have failed to minimise the risk of disaster events occurring.

The Victorian government has a robust risk management framework and is transitioning the public sector towards an outcomes-based reporting framework. This framework provides an opportunity for public and private rural Victorian land management priority measurement and reporting to be geared towards the minimisation of the risk, severity and frequency of disaster events occurring.

Measurement targets that may be reasonably expected in an outcomes-based framework that prioritises people in rural Victoria should align to priority issues. Examples may include:

Issue	Narrative	Measure
People in rural Victoria are safe and well	If primacy of life and safety is the priority of all government action, a measure of safety may be attributed deaths, injury and health outcomes. This may be expressed outright (as in the 2009 Bushfire Royal Commission) or compared to what may normally be expected (as in the 2014 Hazelwood Coroner Investigation).	Number or rate of: -deaths due to disaster events -premature deaths due to disaster events -unexpected injuries due to disaster events -suicide/mental health/wellbeing indicators -disaster events that occur -modelled predictions
Human Rights protected Property Rights are clear	All legislation, regulation, policy, guidelines and actions are required to protect Human Rights, including property rights – many affecting public and private land in rural Victoria do not.	Human Rights including Property Rights are (1) considered and (2) demonstrably protected - validated by audit - demonstrated by effect

Rural Victorians have housing security	All legislation, regulation, policy, practice and product ensure rural residents have housing security if a disaster event occurs. Any plans to compulsorily acquire private property is transparent and provides for resident re-settlement in like for like circumstances.	Planning Scheme provides housing security Number homes: -insured -destroyed in disaster event -damaged in disaster event -rebuilt post disaster event Resettlement -satisfaction -like for like circumstances
Private infrastructure is safe	All legislation, regulation, policy and practice ensure rural private infrastructure is appropriately prioritised for protection	Planning Scheme provides operational continuity security Number and type of infrastructure: -destroyed in disaster event -damaged in disaster event -rebuilt post disaster event Reestablishment satisfaction
Public infrastructure is safe	All legislation, regulation, policy and practice ensure rural public infrastructure and assets are appropriately prioritised for protection	Number/percentage infrastructure insured Public infrastructure is maintained to minimise disaster event occurrence Operational continuity planning is appropriate and fit for purpose Number and type of infrastructure -destroyed in disaster event -damaged in disaster event
Public land is managed for public safety	Public land is maintained for the safety of human life and assets Public land is accessible Is the minimum fuel management target per annum met? Maintenance prioritises public land in proximity to rural populations. A mix of prevention methodologies is used to reduce fuel	Risk level audit each year and over time across rural areas Hectares (and percentage) preventative action taken annually and over time compared to target Fuel load risk (or appropriate tonnes per hectare by land typology) measure of safety is delivered across public land portfolio Public areas maintained for safety Roads are maintained for access Fire/access trails are maintained for access
Endangered Flora and Fauna is appropriately protected	Public land is managed to identify and protect endangered and high value populations of flora and fauna from disaster events	Endangered flora and fauna populations relocated to protect the species Endangered flora and fauna populations are protected in situ Number endangered flora and fauna extinct due to disaster event Number flora and fauna now endangered due to disaster event
Simplicity	Currently reporting occurs through a mixed medium of FFV, DELWP, EMV, CFA, Safer Together and others. It is a mix of state-wide and local in a range of mediums and	One series of agreed measures, responding to priorities reported once at a state-wide level, a regional and local level.

	contexts and is difficult to source, sort through and understand.	
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References used for this section include:

<https://www.igem.vic.gov.au/reports-and-publications/publications/2009-victorian-bushfires-royal-commission-implementation>

<https://www.igem.vic.gov.au/reports-and-publications/igem-reports/final-report-july-2012>

<https://www.igem.vic.gov.au/reports-and-publications/igem-reports/annual-report-july-2014>

<https://www.igem.vic.gov.au/reports-and-publications/igem-reports/victorian-bushfires-royal-commission-2016-progress-report>

[https://www.dtf.vic.gov.au/sites/default/files/document/VGRMF%20-%20July%202018%20update\\_0.pdf](https://www.dtf.vic.gov.au/sites/default/files/document/VGRMF%20-%20July%202018%20update_0.pdf)

<https://www.vic.gov.au/outcomes-reform-victoria>

<https://www.ffm.vic.gov.au/fuel-management-report-2016-17/what-we-achieved-statewide/residual-risk>

<https://www.safertogether.vic.gov.au/understanding-risk>

### 3. Planning

Where priorities are clear and there are measures that demonstrate priorities are being successfully addressed, the gap between the current state, and the desired state, needs to be explored and an action plan developed to close this gap.

In Victoria there appears to be limited alignment between the Victorian Government, DELWP, the Emergency Management Commission and rural Victorian residents, landowners and land managers. It is evidenced in:

- DELWP appears demonstrably unable to recognise, prioritise and meet obligations for minimising risk in managing and maintaining public land, or support minimising risk in the management of private land
- planning appears geared towards emergency response rather than public and private land manager preparedness and resilience
- a private land planning scheme that creates housing insecurity in rural Victoria
- poor land management for people and species based on the false premise that not actively managing environments will protect them, despite evidence to the contrary
- opaque climate adaptation policy that does not include fire risk mitigation, when clearly the terms can be used interchangeably in rural Victoria and
- a public land management practice of fuel management that creates disaster risk in rural Victoria instead of minimising it.

Planning enables all parties that are responsible for managing rural Victorian land to:

- Articulate and understand the current state and risk including agreed priorities and measures
- Articulate and understand the desired state and risk including priorities and measures
- Understand the gap between the current state, and desired state so that the scope of the job at hand and the risk of not doing anything (maintaining the status quo) is clear
- Identify and explore action options that may close the existing gap and respond to priorities in a measurable way
- Evaluate action options to determine which are viable, and which provide the most mix that will respond to priorities, minimise risk, and be measured. Ensure actions are

compared in terms of alignment to priorities, ability to meet measures and their comparative benefits

- Explore barriers and enablers to facilitate the most appropriate mix of action options
- Agree that the mix is appropriate, and modify where required and
- Develop an implementation plan that includes: actions, roles, responsibilities, time frames and resources required to close the gap.

It is important planning considers variability in conditions. Currently planning does not include variability in conditions and use resources efficiently. This suggests the action option mix is flawed. It results in an escalation of risk rather than risk minimisation. Examples include:

- “narrowing hazard reduction window” – a range of action options are available to reduce fuel loads including hot and cool burning, traditional burning, mechanical removal, public fuel collection, and other public and private minimisation activities that complement each other. They extend hazard reduction windows on public and private land in rural Victoria.
- Vegetation of cleared public and private grazing land near populated areas – this is current practice, usually to address an urban offset - creates a fuel load risk that did not exist before that needs to be managed (and evidence is that it is not managed).
- Roadside fuel management – appears to be applied to a minimum extent if it is done at all. Roadside reserves across rural areas facilitate the spread of bushfire, weeds and pest species, and present a risk to road users, recreational roadside reserve users and wildlife. Rural roads are routinely blocked in inclement weather when roadside trees fall. Roads become impassable in disaster events. They are not managed for safety.
- Fuel reduction resourcing appropriation – in the last four years in Victoria, less than 20 per cent of the public fuel reduction budget has been spent on reducing fuel.
- Many routine land management activities on private land in rural Victoria are subject to the requirement to apply for a permit, including in some shires fuel management burning. These permits can be costly and time consuming to apply for and the benefit of the application process is unclear.

References used for this section include:

<https://www.ffm.vic.gov.au/fuel-management-report-2016-17/what-we-achieved-statewide/costs>

#### **4. Resourcing**

Where the action plan is clear, a resource plan can be developed. A resource plan will provide a multivariant assessment of resources required for actions to be completed. It includes:

- Safety
- Governance
- Workforce (public land management, public local government, private land managers, private contractors, industry, associations, indigenous land managers, volunteers, training and development, others)
- Training and skills (formal, informal, cultural, safety, qualifications, experience, cadet, apprentice and any ratio considerations)
- Tools (management, supervisory, implements for specific action purposes)

- Equipment (heavy machinery, light machinery, other)
- Time limitations, restrictions, opportunities (burn time frame limitations, mechanised fuel clearance time frames, workforce effective work times, evening, commercial opportunities)
- Benchmark performance (enables the forecasting of capability based on known variables and include contingencies)
- Cost (dollars)
- Funding Source (Public expense, private expense, commercialisation opportunities, not for profit contributions, in kind support, community group contributions, other)
- Statements of endorsement and support from all parties included within the resourcing plan is important to ensure the scale and scope of funded capability is understood.

## 5. Action

When planning is agreed, implementation takes the form of direct action. During this phase, ensuring regular reporting of completion of actions and tracking of actions towards the achievement of priorities and measures assists to provide public and private accountability, and demonstrate the **risk, severity and frequency of disaster events is being minimised.**

## 6. Review

Review and refinement are an important component of any effective program to ensure that unforeseen changes over time can be considered and variation in actions incorporated.

Review takes the form of:

- Confirming performance expectations as identified in Prioritisation, Measurement, Planning and Resourcing phases
- Confirming performance outcomes achieved
- Confirming the actions that have and have not been executed
- Analysing what went well
- Analysing things that could work better next time
- Areas that planning could perhaps consider that it doesn't – and how this may be incorporated in the planning and resourcing
- Identifying areas in the broader environment that threaten to impact upon the planning, resourcing and acting

I look forward to these Inquiries and Royal Commissions achieving what the last 80 years of reviews in Australia have not, a safe and sustainable rural Victoria.

Kind Regards

Narelle Campbell