



LEGISLATIVE ASSEMBLY
FOR THE AUSTRALIAN CAPITAL TERRITORY

STANDING COMMITTEE ON ENVIRONMENT, CLIMATE CHANGE AND BIODIVERSITY
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Submission Cover Sheet

Inquiry into ACT environment's Bushfire preparedness

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Overview

Landscape level bushfire management by the year 2000 was underpinned by an extensive knowledge base (scientific et al) with some exceptional experience and where these elements coincided a demonstrable best practice risk reduction and fire event management occurred with some resounding successes.

Gaps appeared where responsible agencies were not up to speed resulting in some entirely avoidable catastrophic results, like Canberra's 2003 fire event.

It is entirely factual to say much of the response to the 2019/20 fire season was underpinned by similar gaps in many regions that led to failed early response and poor landscape level management of the ensuing fires.

Some 3.7million hectares of the 5.4 million hectares burnt in NSW bushfires was in national parks, comprising 37% of the whole NSW park system. Some 75% of the BMWHA area was burnt. Any repeat of fires at short intervals may irrevocably damage most of the forest ecosystems. These statistics are like the ACT. The ACT must be considered in broader context of NSW landscape as it is, but a region surrounded by NSW. ACT is part of the whole.

This website provides an unbiased insight into the NSW bushfires. Independent Bushfire Group website. <<https://independentbushfiregroup.org/>>

In the ACT gaps re-appeared in around 2015 when actions of key CEOs of key responsible agencies were inattentive or significantly absent. The fundamental principles underpinning successful fire management were abandoned. Key changes to legislation also had a severe impact by the disfranchising of community level expert committees to ensure capability and to build community resilience.

All elements for successful bushfire management are sitting on the shelf. Improvement will happen when CEO's, DGs, Commissioners and Ministers ensure that proper professional standards are applied, implemented and take personal accountability for success and failure. A reminder that 66% of all major projects with a value over \$300 million fail due entirely to a lack of due diligence to the appropriate principles of program/project management, see [Figure 2](#). Landscape level fire management has model principles and management systems that are easily implemented and quality assured.

We must acknowledge that even the best laid plans come apart at times, but these should be the exception, yet still well managed. The occasional fire that escapes early containment should be well managed until containment conditions are available. This means managing the escaped fire for perhaps a week or three in current weather regimes.

We must appreciate that NSW bushfire management is in a very poor state of capability. This requires an acknowledgement and requirement to plan for very limited if any neighbourly support in high fire danger seasons. This is critically important to windward NSW areas of Tumut for example. It may require aggressive assistance to rapid attack with NSW. A special focus needs to ensure containment of fires from progressing easterly to our NSW neighbours.

Please note this submission refers to environment of last five years preceding the recent appointments of Acting Commissioner ESA and Chief Officer RFS.

Background

Bush fire management has a well-defined scientifically based approach that has been tried and tested successfully across the Eastern Australian Ranges over many decades.

Bushfire management is only successful (fires managed within community determined/acceptable risk profiles) when those well-defined management parameters are implemented in full.

Thorough expert practitioner reviews of the ACT 2003 and across Eastern Australia in 2019/2020 demonstrate very clearly that implementation of management/governance parameters had failed. This was entirely due to a failure to audit, review and report to Government on progress and implementation which would have clearly demonstrated a failure to be prepared to respond efficiently and effectively.

The responsibility and accountability primarily falls at feet of the Director Generals of J&CS and EPSDD and depending on the advice provided to relevant Ministers and Cabinet proportionally on them, if they failed to ask for reports or failed to respond to reports from the Director Generals.

I note changes encouraged by Commissioners to the Emergencies Act in 2016 including consultation on appointments of Chief Officer and Deputy Chief Officer RFS and later removal of provisions for the Bush Fire Council to be consulted before approval of Bushfire Operations Plans and removal of the composition requirements when it became the Multi-Hazard Council. These ignored the government agreement to previous 2003 McLeod report. Note Recommendations 10.11.12 Coronial Inquiry.

Recently there has been a lack of professional consultation with senior Parks and Conservation staff who disagree that the All-Hazards Council should be asking for information about implementation of BOP activities. The Emergencies Act 2004 has one provision that gives the Council an important responsibility in this regard.

Section 72 (7) of the Emergencies Act 2004, says that the Commissioner must, in consultation with the All-Hazard Advisory Council, monitor the scope and effectiveness of the Strategic Bushfire Management Plan and seek advice of Council in approving the BOPs.

As you are aware the EPSDD Bushfire Operational Plan contains most of the activities implemented to protect Canberra from bushfires and thereby is an important part of the Strategic Bushfire Management Plan.

Staff appointments is an issue for EPSDD, particularly the Manager of the Fire Management Unit –this position holder must be a competent Level 3 ICs with considerable experience in forest fire control. Recommendation 41 from the Coronial Inquiry speaks to that point, but it has been ignored in the recent appointment of the replacement for that position.

Responding to unofficial reports, it is also abundantly clear that the Commissioners of ESA during the last five years had failed to meet reasonable profession standards regarding Bushfire PPRR governance.

The ACT has all the basic elements of achieving success from prior planning and experience. Operationally ESA and EPSDD basically lacks key expertise, focus and guidance on managing fire especially evident in those critical fire periods and being adequately prepared for such events.

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The answer lies in simply getting senior experienced advice to put in place and support staff to achieve the best they can be. There are many people who would voluntarily assist the Commissioner and DGs to achieve this in a short period.

I have attached the basics of Landscape level bushfire management 'one pager' below. The attached file 'reducing costs' provides an independent overview by professional practitioners with enduring success of many decades of NSW situation. It provides a useful overview.

As an expert I have done it all successfully and taught many others. You do not need coronial and commissions of inquiry to see the problem or to fix it. The \$millions expended on inquires and coronial could have made significant improvement on community resilience (100 plus complete rural house protection systems in ACT) and training key staff. I urge all of us to grasp the nettle and require DG level to attend to this issue. Do away with the culture of 'don't ask don't tell' and 'do not see what you don't look for.'

Questions to be asked:

Where does bushfire sit in all of government landscape on risk consequence table against terrorism, health, transport, education, social service, homelessness etc?

Are the ACT bushfire outcome measures still valid? – due to resources and droughts and higher longer FDIs there is a 100% chance an escaped fire will be greater than 100,000 hectares based on recent experience.

I suggest bushfire risk to include a focus circle of 100 plus kilometres west from Parliament House.

As the current coronial processes fail what are you doing to replace it? If ESA had prepared incident and after incident reviews to the professional standard 2019/20, then these would be adequate to guide future action.

What review and analysis has taken place to analyse the cost to benefits dollars spent on prevention response and recovery, where some suggest \$1 prevention saves \$3reponse and \$5 on recovery? The ACT could model this quickly to support government consideration of priority for expenditure and policy.

What of the reality of recovery actions across Australia? Ministers make press releases of billions of dollars however the on-ground reality is that people remain homeless on south coast, Lismore is still a debacle by any measure and despite the good press releases many communities have just been forgotten or missed out due to some bureaucratic boundary definitions like Murwillumbah.

What is the role of OH&S in driving response planning and policy and what is the reality of rapid attack to meet the goal of contained ignitions to greater majority of fires? While Rapid and Remote attack is suggested as first response to contain ignitions the reality is there is very diminished experience and knowledge due to retirements and change in agency workforce priorities and majority of aircraft being deployed have extreme limits on rapid attack deployment by way of unsuitable aircraft, limited licencing and ground crews not being responded at night and where fire indices are above moderate (FDI 30) for so called health and safety rules and that means no deployments in bushfire danger periods (I do not understand the detail of the required FDI based deployment reviews, for example how long it takes and is it an overly cautious approach). This type of reality saw no deployments in NSW Green Wattle Creek fires, where previously all those fires would have been contained given the weather at the time, the result 100,000 hectares of Sydney Water Catchment burnt to a crisp. Similar policies are now being applied in ACT and worse of all on

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the western ACT/NSW perimeter. Noting that an Incident controller is faced with decisions of do I risk a couple of fully trained fire fighters to a rapid attack, where they may/will decide to pull out if conditions are too risky, or do I risk a fire exponentially expanding and killing lots of civilians that we are there to protect.

Why has ESA adopted “it our business don’t ask don’t tell” culture? The McLeod review 2003 recommended that key documents and policies be readily available to the public. It is exceptionally difficult to view material ESA holds as the majority require an FOI. Previous Bushfire Council report to Ministers that contain valuable information have been removed from public view. The myriad of emergency sub plans, apart from bush fire, are hidden from public view. My experience to obtain the flood plan was met with please don’t ask. You cannot plan professionally or as a community member if you are unable to see what the ESA has in store for an emergency response. ESA web site has a very long legal disclaimer saying must not rely on their advice alone and do your own research!!,

Is ESA hiding behind lots of glossy documents/plans and policies? The SBFMP is an overview master document that guides and enables operational planning for risk amelioration and annual works plans. The plan principles originally developed in 1960 /70s by ACT forestry manager has not changed much, just glossed up. The fundamentals have evolved a bit with technology, but the underlying landscape level fire management has not, as it is basic physics. The outcome often seems to be to update the plan but that does not mean implement it – that requires knowledgeable and experienced staff in many agencies across the ACT. There is no transparency or reporting on outcomes, strategies and action of this SBFMP.

What outcome is acceptable to Government vs role professional public servants? My impression over the last decade is that there is now, by politicians, a glossing over of the real drama to individual lives and standing at press conferences announcing another catastrophe is commonplace with veiled promises of help and assistance. A new world order and the consequences may be an acceptance that government plays little or no role in future in risk management and response and recovery will be an individual responsibility with a facade of government assistance to few lucky ones. Public servants have an obligation to meet professional standards in providing advice like international best practice on risk consequence tables and then underlying advice on risk assessment and recommendations on socially acceptable level, like F&R room of origin and whole costed and delivered systems to achieve it.

What of common sense and the pub test? Any reasonable assessment and reading of available literature will show that there is a problem and there are sensible affordable solutions to bring risk /consequence to a socially determined and understood value. Following the Bunga ship grounding on the Great Barrier Reef the AMSA Board lead an international standard risk assessment and consulted widely and publicly to agree an acceptable risk profile and then implemented shipping management adjustments to achieve it. It would be very possible to achieve this simply across the ACT.

How is the ACT placed to lead bushfire management? I previously wrote expressing that the ACT is best possible job to have, size diversity, resources, brain power and support services. We should be at the top setting the benchmark standards.

What do the performance statements mean? The below table provides performance targets for bushfires from current SBFMP. The yellow highlight is the out clause. Where is the measure about finding all ignitions within five minutes that would cause meaning for the yellow bit. What must be relevant is to get the fire that will go crazy, if you don’t get it contained within 30 minutes and end up as a 2003 scale event. Fires in the BAZ are easy, what about the Brindabellas and Tumut Region. All

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medical evidence and extensive research say 12-hour shifts are not good, detailed research in 1970s and 80s changed whole shift arrangements for bushfire fighting- we seem to have abandoned that research. And what is the performance measure 6.2 on the 5 % that get away, < ten houses lost < ten killed in the BAZ and the one big one from Tumut < 90% forests burned < 400 houses lost < 100 people killed and 1000 injured?? OH&S missing as research recently advises bushfire smoke is catastrophic. There are no performance statements regarding air quality and risk to life immediate and long term. We know the 3 months of smoke haze of 19/20 did serious harm.

6.1	During periods with a Fire Danger Rating of High or above, response resources will be deployed to bushfires within the following timeframes after the ESA becomes aware of the bushfire: 30 minutes, for fires within the BAZ 45 minutes, for rural fires outside the BAZ.
6.2	95% of bushfires will be contained by the first response shift deployed (within the first 12 hours of the response).
6.3	Proactively maintain the capability to operate a full IMT for the first two shifts.
6.4	Maintain strategies and resources for RAFT, including enhancing operational support processes, and investigate expansion of the RFS Remote Area Unit framework to incorporate Rapid Aerial Response Teams and arduous hand crews.

What is the remedy to beat the culture wars between agencies. Unmanaged this is a recipe for exponential damage to life and property. It must be actively engaged and managed by the top brass on an ongoing basis. It has and can be done there are lots of good examples so let's make this a present and future priority.

The RFS and F&R need to review and explore the lessons learnt from recent urban fires in Perth and 2019/20 NSW Southern Ranges where unusual property damage has ensued from recent fire season. Anecdotal advice is that urban fringe hazard reduction and prevention works were not implemented in preseason works and landowners show considerable apathy and complacency.

Recommendations.

- Emphasise the ESA Commissioner role to overtly oversee and report on RFS/EPSSD/F&R collegiate landscape level bushfire management.
- ESA Commissioner via RFS/EPSSD prepare annual rolling three-year BOP and implement live reporting on web for public viewing with minimum monthly updates.
- Chief Officer RFS conduct weekly landscape level scenario IMT exercises for next year.
- Chief Officer RFS form an informal expert advisory panel to guide updates of Operational Policy, SBFMP and BOP as a subsidiary to All Hazards Council.
- All Hazards Council to be consulted on adequacy of skills for senior officers of RFS and Level 3 ICs for major bushfires.
- Conduct an urgent independent external review of fire management and fire suppression lessons from 2020 bushfires in ACT to inform revision of the SBMP (due for revision by Nov 24)
- DGs of J&CS and EPSSD prepare a quarterly report, with some independent expert advice, for Public Review of progress on implementation SBMP (and all other Emergency subplans) prior to submission to Government.
- Commissioner to install professional standard incident reporting and after incident reviews with public consultation and make publically available on ESA web site.

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- Commissioner to undertake a public review of triage protocol for bushfire response and ensure publication on ESA web site and implementation of the protocol.
- Commissioner to undertake a public consultation and review of OH&S for operational deployment rules to ensure appropriate ACT wide risk profiles are met e.g. LAT deployment limitations, night operations, risk rules for remote and rapid attack.
- Commissioner to undertake an assessment of the number/location of ACT Rural Properties (Houses/sheds/stock) that are self-reliant for extreme conditions and report publically by June 2024 and thereafter annually.
- Commissioner to provide a cost benefit study on SBFMP implementation over next ten years.
- Commissioner to update and make performance measure in the SBFMP meaningful targets to achieve at Low Moderate and Extreme/Catastrophic FDIs.
- EPSD to EPSSD to have a plan to recruit at least one senior officer, who is highly experienced in bushfire management, prior to summer of 2024-25.
- Restate the bushfire outcome –
 - Best we can be is all fires detected within five minutes and action initiated to contain them in six minutes. Escaped fires to be managed at landscape level until containment possible. (Explain why in sub statement – smoke to unborns, cost benefit, damage, exponential etc);
 - Define strategies to achieve this;
 - Define actions for each strategy;
 - RFS Cost, prioritise and consult community then report to All Hazards Committee for endorsement/comment/adjustment and submit for Government endorsement or not and adjust accordingly; and
 - Contain all this in public rolling three-year RFS business plan reported publically quarterly on ESA web site.



reducing-costs-imp
acts-bushfires-index

Figure 1 Landscape Level Fire Management - PPRR

Risk assessment

- a general common-sense overview from knowledgeable people to place fire risk/consequence in the overall community risk consequence table.
- community risk acceptance level must be determined and agreed overtly by elected government.
- Action Plan to address the risk through SBFMP, BOP, Response Plan, Recovery Plan.
- Government budget appropriation agreed.
- Responsible agencies to implement and report.
- Independent audit and review provided to government/public annually.

Maps

- Topography, Property Assets, Ecosystem zoning, broad Fire history & Hazard reductions.
- Fire advantages.
- Historic weather patterns.
- Model ignitions in low medium high (FDIs and SDIs).

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- Model ignitions in Extreme/Catastrophic (For fire modelling – detailed topography and fuel maps and ecosystem zoning/classification to allow fire modelling to be low/medium/highly accurate).

Fire management plan

Key assets, key ecosystems, rare plants and animals, preferred frequency, preferred severity, and map areas to allow fire for strategic fuel management and containment areas.

Practice scenarios in broad context of Brindabella ignitions fires i.e. downwind.

Provide for city zone Fire Management Strategy and actions e.g. Community Fire Units, Elderly resident assistance for home HR.

Model areas 20 -50 kilometres windward of core area to identify potential trouble ignitions.

Model areas to east to prioritise with NSW priority areas.

Roll up low and normal seasons to a management approach.

Roll up extreme seasons to a management approach.

In the extreme seasons approach _ calculate cost to benefit of aggressive RAFF and Rapid attack and identify resourcing requirements. Simple table of onsite and on demand and on patrol resourcing to identify ignitions within five minutes and undertake actual field attack within ten minutes to get containment and mop up. Note redundancy plans should RARA (remote area rapid attack) fail.

Identify persons and management structures to implement fire plan at low, normal, extreme/catastrophic.

Put an admin/governance system (performance and audit reporting) around this to ensure compliance with plan and report monthly to Commissioner and DGs/public.

Key to success


An overt key agency and community committee to drive collegiate implementation to meet monthly.

IMT that is capable to provide strategic fire 'trickle' management towards opportunistic containment and black out.

Figure2




The November 2011 World Project Management Congress provided the following useful insights:

- 66% of mega projects (i.e. over \$300 million) fail to meet the primary outcomes due almost entirely to the project owner not communicating the outcomes required to the project manager;(morrow)
 - the London Olympics project manager indicated that their success is due to the single focus on ensuring national pride i.e. ensuring cooperation and support from all stakeholders and parties to the games building program;
 - the majority of failed projects have had their sponsors 'missing in action';
 - poor project management practices are devastating to big projects as they just inevitably unravel ('for the sake of a horseshoe nail'); and
 - demanding an emphasis on front end loading (detailed planning before execution) will materially improve the chances of project success.
- 



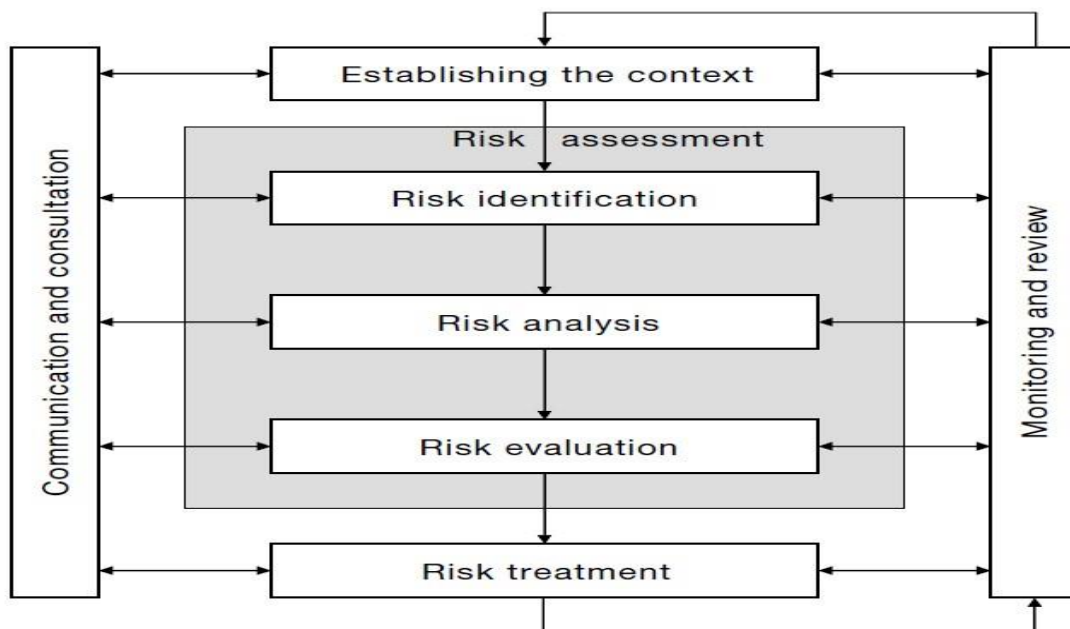
Facts 3

- Expect your open heart surgeon to have a plan and a back up plan
 - Taxpayer expects you to have a plan
- 

Risk



The Risk Management Process ISO 31000:2009





Team building – Incident Management Team

- Build the team as required to do the job - overkill at first then modify - probably need all cogs at some level
- Select people on the basis of merit to fill positions on the team
- Do not under any circumstances put your mates on the teams (say no to nepotism)
- In the following Inquiry its gloves off and everyone for themselves – each will have their own barrister
- Watch team members - it is your temporary family and your organisation and everyone's career that is at stake



End

Background of Opinion Author; Gregor Manson BSc (Forestry)

Gregor Manson began his 40-year career in the Agro-Forestry industry including time as an RFS volunteer in central west NSW. Later he joined NSW NPWS in Blue Mountains as Chief Ranger and then Superintendent from 1985 to 1995. He progressed to other senior executive roles across state and federal government focused on natural resources and emergency management, including NPWS Director for Snowy Region, Executive Director of the Great Barrier Reef Marine Park Authority and Commissioner of Emergency Services for the Australian Capital Territory. Gregor has a very strong track record in managing fire in the landscape, during many significant fire incidents and as an emergency controller. He has also played a significant role in developing training manuals and fire protection plans, teaching incident management skills and as a member of the Australasian Fire and Emergency Authorities Council and the Australian Emergency Management Committee, and as a Director of the National Aerial Firefighting Centre. Gregor's focus has been on improving science-based land management, risk management and strategic planning. He has been a strong advocate for local planning through an all-of-agency approach, to build community ownership and resilience in managing risks and developing responses.