

*National Royal Commission into Black Summer
Bushfires*

Submission from
AUSTRALIAN WORKERS' UNION

May 2020

About the Australian Workers' Union.

The Australian Workers' Union ('AWU') is the nation's oldest union, and also one of the largest. The AWU has wide coverage in many blue-collar industries, such as steel, aluminium, chemicals, plastics and building materials manufacturing, oil and gas extraction and processing, metal ore mining, agriculture and civil construction.

Executive Summary

Australian Worker's Union (AWU) members were at the front line throughout Australia during the 2019-20 fire season. The experience of our members indicates that nothing can be allowed to ever be the same again.

Despite best efforts of professional firefighters to suppress fires, their scale and intensity in the era of climate change in 2020 means that there has to be an increased focus on the need for more investment, coordination and support for both hazard reduction and fire suppression activities. Business as usual, if it means underfunding in personnel and equipment, reliance on casuals instead of full-time professionals, lack of preparatory and preventative activities and coordinated planning and deployment will be opposed by the AWU on behalf of professional firefighter members of the AWU and the community.

The AWU has made detailed submissions to two separate independent state inquiries in both NSW and Victoria. These are respectively, the NSW Independent Bushfire Inquiry¹ and the Inquiry into the 2019-20 Victorian Fire Season². The common threads from those submissions constitute the bulk of the response to the Commonwealth Inquiry. The attention of the Royal Commission is therefore also directed to those separate submissions for the more detailed analysis, findings, conclusions and recommendations they contain relevant to the Royal Commission's inquiry and terms of reference.

There are however several major lessons which should be highlighted here based on the experiences in both NSW and Victoria and in other states and territories in 2019-20:

- It is clear from the evidence of AWU members and from events on the ground along the fire front line that too much was increasingly expected by too many from too few.
- AWU firefighter members paid too big a price to fight off the fires which went well beyond their job description. (Some lost their own properties and possessions). The over-reliance on casuals and volunteers to fight deadly fires proved costly as our submissions outline.
- Together, around 7 million hectares were burnt in NSW and Victoria; thirty lives tragically lost and; thousands of properties either damaged or

¹ <https://www.nsw.gov.au/improving-nsw/projects-and-initiatives/nsw-independent-bushfire-inquiry/>

² <https://www.igem.vic.gov.au/Fire-Season-Inquiry>

destroyed. This is a shocking legacy. And there is a huge clean-up bill.

- A fully funded and properly equipped National Parks and Wildlife Service (NPWS) and Forestry Corporation (Forestry Corp) in NSW and the Department of Environment, Land, Water and Planning (DELWP) in Victoria with both fire and land management responsibilities are minimum requirements to ensure recovery work and fire hazard reduction are undertaken before the next fire season.
- Full funding and proper resourcing of existing hazard reduction and land management and firefighting agencies in NSW and Victoria (and in other jurisdictions) is much more effective than the imposition of a possible federally imposed centralised model which would serve to hamper rather than help effectiveness at a state level governed by state based laws and agencies and local conditions.
- However, supplementation of state budgets may be required in order to achieve the required hazard reduction activities and firefighting preparedness in time for the 2020-21 bushfire season. This may be facilitated by the consideration by the Council of Australian Governments (COAG) in order to expedite especially in the context of the competing budgetary demands of addressing the coronavirus in 2020.
- A full cost accounting approach to the total cost of externalities on society generated by wildfires rapidly establishes the value for money to society and economy of improved hazard management, fire prevention and fire suppression functions.³
- The AWU supports many more full time jobs, in preference to an even greater reliance on casualization to facilitate year-round hazard reduction and fire suppression functions. The AWU will campaign tirelessly to achieve these changes.
- There is scope to introduce new techniques for all-year-round hazard reduction by implementing more indigenous “cool” burning to complement fuel and hazard reduction functions. But nothing gets done unless new, additional funding becomes available.

³ https://en.wikipedia.org/wiki/Environmental_full-cost_accounting

- Inter-jurisdictional and international cooperation are important areas for a proactive firefighting work program in time for the next fire season, encompassing manpower, equipment, operating platforms and strategy.
- There is scope for enhanced engagement by the federal government to ensure appropriate plans are in place at a state level and for mechanisms to ensure the national coordination of manpower and equipment functions (especially aircraft) in preference to reactive responses such as the deployment of the ADF which should only be a response of last resort.

The AWU will continue to campaign at a national and state branch level for significantly better outcomes. Our members and the people they serve in States and Territories deserve nothing less. The AWU stands ready to assist the Royal Commission in this vital work.

Introduction

This submission draws on the major findings and recommendations from two separate submissions made to inquiries in NSW and Victoria which have broader application in terms of their focus on funding and resourcing.

On 14 January 2020, the Victorian Government announced an [independent inquiry into the 2019-2020 Victorian fire season](#) would be conducted by the Inspector-General for Emergency Management (IGEM).⁴

On 3 February, the NSW Government announced the commissioning of an Independent Bushfire Inquiry.⁵ Its terms of reference were published on 10 February 2020.⁶

The aims of each independent inquiry is to provide input to respective governments' ahead of the next bushfire season.

In addition to their findings and recommendations the submissions contained detailed analysis which was specific to the situation and outlook in each jurisdiction. However, a number of matters will also be relevant to the Royal Commission inquiry with a national focus.

This submission draws on those submissions to distil common threads and lessons learned. Each is summarised briefly below.

New South Wales (NSW) Fire Season

In the immediate wake of the wildfire emergency in NSW which claimed 25 lives, consumed 1300 properties and burnt over 5 million (see box below), the AWU is concerned about the lack of priority, funding, coordination and planning given by relevant authorities' to undertaking sufficient hazard reduction burns (HRBs) among other activities in the lead up to the 2019-20 summer.

Fire in NSW does not discriminate between national parks, state forests on state lands, or state borders.

⁴ <https://www.igem.vic.gov.au/Fire-Season-Inquiry>

⁵ <https://www.nsw.gov.au/improving-nsw/projects-and-initiatives/nsw-independent-bushfire-inquiry/>

⁶ <https://www.nsw.gov.au/improving-nsw/projects-and-initiatives/make-a-submission-to-the-bushfire-inquiry/nsw-independent-bushfire-inquiry-terms-of-reference/>



Hazard reduction burn, Heathcote National Park. Hazard reduction burn, NSW Forestry

Area affected by fires in New South Wales

Based on the data DPIE currently has released which considers the relative severity of fires within the fire grounds identified by the Rural Fire Service (RFS):

- 5.3 million hectares (6.7%) of NSW has been affected by the wildfires. The severity of fire within this total area varies.
- More than 37% of the national park estate has been impacted. In key bioregions, the figure is well over 40%.
- More than 80% of the World Heritage listed Greater Blue Mountains Area and 54% of the NSW components of the Gondwana Rainforests of Australia World Heritage property have been affected by fire.
- The most affected ecosystems are rainforests (35% of their state-wide extent), wet sclerophyll forests (41%) and heathlands (53%).
- More than 60 threatened fauna species have been affected by the fires, including 32 species for which 30% or more of all recorded locations occur in the burn areas.
- Many individual national parks have been seriously impacted:
 - 55 parks or reserves have had more than 99% of their area affected by fire
 - 70 parks or reserves have 75-99% of their area affected
 - 29 parks or reserves have 50-74% of their area affected.

Source: <https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/fire/park-recovery-and-rehabilitation/recovering-from-2019-20-fires/understanding-the-impact-of-the-2019-20-fires>

The AWU's submission to the NSW Inquiry reviews recent experiences and addresses what can be learnt from the 2019-20 wildfires such as plans for the avoidance and suppression of bushfires.

The submission identifies areas for immediate policy reform and additional funding in order to better prepare for future fire seasons in NSW.

The submission also includes first-hand accounts of AWU members in both the National Parks and Wildlife Service (NPWS) and Forestry Corporation of NSW (Forestry Corp) as evidence of the arguments made. The "bottom line" is that NSW professional firefighters have acquitted themselves in an extraordinary way this summer in the face of unprecedented wildfires.

HRBs are not intended to stop or prevent fires but to reduce the intensity of the fire so that firefighters have a better chance of containing / managing it. In other words, fire has to be effectively fought wherever possible prior to its outbreak and when it occurs, suppressed as quickly as possible.

And when done effectively, prevention programs reduce the likelihood of the emergency, reactive, gap-filling Commonwealth intervention of the ADF in functions such as evacuation and land clearing and knock-on reconstruction and recovery roles and functions undertaken by the states. And the costs of these types of reactive responses are potentially avoided through an appropriately resourced, thorough and well planned preventive, hazard reduction program at a state level.

The above list of environmental impacts alone (see box) is really an admission of failure in the management of the state's public estate by DPIE in NSW. While it is true in the words of DPIE that:

*"The 2019-20 bushfires in New South Wales (NSW) have been unprecedented in their extent and intensity"*⁷

It is also true that the business as usual approach by DPIE to planning and preparations for the 2019-20 summer has clearly not been anywhere near adequate in preparing the landscape for the conditions and for the life and death choices which NSW landowners, residents and firefighters (both volunteer and professional) alike ultimately faced across the state in the face of the wildfires which ensued.

It is not expected that today, given the weight of the evidence in the wake of the calamitous wildfires experienced over the summer in 2019-20 (refer to DPIE's box above) that the NPWS would be as cavalier in going into the summer fire season

⁷ <https://www.environment.nsw.gov.au/topics/parks-reserves-and-protected-areas/fire/park-recovery-and-rehabilitation/recovering-from-2019-20-fires/understanding-the-impact-of-the-2019-20-fires>

with 115 frontline firefighter vacancies still unfilled despite the AWU's urgent concerns⁸ and following cuts to fire trained positions in NPWS and related workload challenges affecting HRBs.⁹

Deficiencies in programming, funding and coordination overseen by DPIE as lead department contributed to a higher risk environment in large areas of the state in the face of extreme weather conditions and intense fires. The lack of policy coherence is illustrated by the array of responsible agencies in related areas such as forestry management and water quality management.¹⁰

This does not just relate to preparing for extraordinary weather - likely climate change related - but to the abject lack of necessary planning, preparation and resources by the NSW Government devoted to reducing the fuel load to prevent and ultimately the effort required to suppress wildfires across our national parks and state-owned forestry.

What happened?

During 2019-20, the NSW Government ignored how conditions had changed in the face of drought and climate change while assuming a business-as-usual approach (for budgetary purposes) which would both save money on the one hand (by avoiding budget supplementation to the NSW National Parks and Wildlife Service (NPWS)) while making money on the other (by attempting to privatise Forestry Corporation of NSW (Forestry Corp)).

This mix proved to be a costly distraction in facing the wildfire emergency which ultimately consumed vast areas of the State this summer and which tragically resulted in lives lost.

AWU's submission provides first-hand testimony of what could have been different from those serving on the fire frontline. It also validates the point that our past calls for change to do more to "get ahead of the game" were not just part of a vested interest campaign by the AWU but an honest reflection of what we believed to be needed to address the growing threat before the onslaught encountered last summer.

⁸ <https://www.illawarramercury.com.au/story/6511263/near-misses-union-claims-vacancies-put-npws-firefighters-at-risk/>

⁹ <https://coastcommunitynews.com.au/central-coast/news/2019/12/35-cut-to-fire-trained-positions-in-national-parks/>

¹⁰ https://www.dpi.nsw.gov.au/_data/assets/pdf_file/0005/833792/Overview-of-the-NSW-Forest-Management-Framework.pdf

The AWU recently made a submission to the NSW Parliament's *Inquiry into the health impacts of exposure to poor levels of air quality resulting from bushfires and drought*. The submission is [available here](#).¹¹

The submission raised a number of safety issues for AWU firefighters at [59]-[70], which were also brought to the attention of the current Bushfire Inquiry and will be interest to the Royal Commission.

AWU recommendations following consultations with AWU Firefighters in NSW

The following section outlines the key recommendations drawn to the attention of the NSW inquiry based on the first-hand experience and knowledge of professional firefighters at both NPWS and Forestry Corp who had to confront the summer fires. (The experiences and reflections of professional firefighters in NPWS and Forestry Corp can be found in Attachment A and B, respectively in the AWU's submission to the NSW inquiry).

National Parks and Wildlife Service

1. The 50 Field Officer/Firefighter positions which remain vacant must be filled as a matter of urgency.
2. Serious breaches of Health and Safety were identified, and urgent action needs to be taken to:
 - Ensure all fire vehicles are fitted with defibrillators
 - Ensure paramedics are trained in winching
 - Ambulances are located near fire crews.
3. With the new lower paid Field Officers not having a career path, and the recognition that it can take around 5 years to be fully competent in firefighting the turnover of this group is of great concern for the future. We therefore recommend that it is of critical importance that career paths are structured for these Field Officers to ensure our firefighting capacity is not diminished into the future.
4. With the destruction of wildlife and need to put urgent strategies in place, we call for the employment of 40 Pest Control Field Officers.
5. NPWS need to upgrade their current firefighting plant, particularly bulldozers. Field Staff need to be properly consulted on the slip-ons (Cat 9) as they need a more robust version (The current Cat 9s are simply not up to it, which is noted in Attachment A).

¹¹ <https://www.awu.net.au/wp-content/docs/nsw/AWU%20Submission%20to%20NSW%20Air%20Quality%20Inquiry.pdf? t=1584090856>



Source: <https://www.illawarramercury.com.au/story/6511263/near-misses-union-claims-vacancies-put-npws-firefighters-at-risk/>

Forestry Corporation

1. With the massive destruction of FCNSW assets, we need an investment of \$200 million in the plantation of new forests both for future harvesting as well as natural habitat. We call for the employment of 50 Field Officers responsible for this work. These Field Officers should also be trained firefighters.
2. Employ 20 Pest Control Field Officers, 10 for the Northern Region and 10 for the Southern Region.
3. Need to employ Fire Mitigation Teams and 2 X 10 Field Officers. One in the Northern Region and the Southern Region. Both would allocate responsibility in the Western Region. Field Officers would need to be trained in Heavy Plant and Chain saws and would need to be flexible. Need to purchase 2 D4 Bulldozers.
4. Need an additional \$15 million in funding for HR burns.
5. There have been calls for an end of logging in “protective” native forests in the wake of the 2020 bushfires. It has been reported that a group of experts has called for the ban in response to “climate, fire and drought” but others say it is a “simplistic solution to a complex problem” (refer to NSW submission for details).



Source: <https://www.forestrycorporation.com.au/visit>

Additional findings

A number of obvious reforms such as improved federal-state coordination, international cooperation and funding are evident from the experiences in the NSW 2019-20 fire season. (This is addressed in more detail below).

However, there are a number of additional conclusions vital at a state level. NSW is well behind in many aspects in improving its appreciation for the risk and cost of calamitous fire on the public estate. Whether in national parks, in state forests on state land or in between country and towns and cities, the approach to hazard reduction and fire management must change or even more lives and property risk being lost in future fire seasons. It will require the conscious commitment by the NSW Government to avoid (and limit to the extent which is practicable) the costs of future (and more frequent) wildfires.

Enhanced funding in manpower and resources, and improved strategies and coordination of relevant agencies focused solely on hazard reduction and fire suppression in national parks and public land is urgently required. Declaration of s44 under RFS jurisdiction is problematic and had mixed results especially regarding back burning. Machinery of government changes could fast-track establishment of a dedicated fire management agency in NSW.

Testimony of AWU members in the thick of the 2019-20 fire season is compelling. It offers an insight into the challenges faced by knowledgeable firefighter members who, calling on years of accumulated experience in undertaking effective HRBs and fire suppression were stretched beyond what could be reasonably expected from any state employee in protecting the public estate in addition to private property and lives; which in the end became the overriding consideration for members and volunteers alike across the state.

The situation facing our members in the NPWS is particularly acute. There is a lack of clarity on the priority attached to fire and land management functions which suffer from a mix of shared responsibilities and blurred accountabilities which only serve to limit the priority given in budget and resources to fire related functions in NPWS. This must change.

Forestry Corp has in many respects a clearer “line of sight” on its core responsibilities (promotion and protection of the state’s reserve forestry and timber assets, tourism) and yet AWU firefighter members found themselves on private property and protecting lives (including the mix of hired seasonal casuals in Forestry Corp) during the fire season at the same time as the government was totally consumed by privatisation planning for the Corp.

Victorian Fire Season

In Victoria, one of the key lessons learned from the Victorian Bushfires Royal Commission (VBRC) was that insufficient prescribed burning had occurred over a prolonged period leading up to that calamitous Saturday, on 7 February 2009. Fuel reduction burns (FRBs) are not intended to stop or prevent fires but to reduce the intensity of the fire so that firefighters have a better chance of containing / managing the fire.

In other words, as in NSW and elsewhere, fire has to be effectively controlled and wherever possible prior to its outbreak and when it occurs, suppressed as quickly as possible. The Black Saturday fires burnt 430,000 hectares. The 2019-20 Victorian fires resulted in far less mortality than that which occurred on Black Saturday (although every death is tragic).

Victoria suffered damage to 1.5 million hectares (more than 3 times the impact of Black Saturday with a substantial impact on forestry reserves¹²). East Gippsland and Victoria's north-east were the hardest hit areas during the bushfire crisis. 405 residential buildings and 653 non-residential buildings have been damaged or destroyed and five lives taken in Victoria this fire season.¹³

The total economic costs of wildfire dwarf investment by relevant authorities in hazard reduction and effective fire suppression. Some estimates already have the cost of the wildfires to the Victorian economy as being in the billions of dollars in addition to slower economic growth and significant economic impacts on regional economies.¹⁴

According to some estimates, the costs of the recent wildfires may reach \$100 billion or more nation-wide on a similar basis.¹⁵ Other estimates indicate a smaller but still significant impact on GDP especially on agriculture and tourism.¹⁶

A more accurate total will be unknown for some time. In either case, that adds up to between 1.5 to 2 per cent of annual GDP.

¹² <https://www.theage.com.au/politics/victoria/big-impacts-almost-half-of-areas-in-east-gippsland-approved-for-logging-burnt-20200120-p53sx1.html>

¹³ <https://www.theage.com.au/national/victoria/65-million-relief-package-for-fire-areas-20200126-p53uua.html>

¹⁴ <https://www.theage.com.au/politics/victoria/victoria-fires-to-cost-hundreds-of-millions-but-surplus-safe-says-government-20200124-p53uiw.html>

¹⁵ <https://theconversation.com/with-costs-approaching-100-billion-the-fires-are-australias-costliest-natural-disaster-129433>

¹⁶ <https://www.theage.com.au/politics/federal/bushfires-may-crimp-living-standards-long-term-as-insurance-costs-hit-2b-20200124-p53uen.html>

Fire prevention and incidence reduction when adequately resourced represents tremendous value for money in avoidable costs. These also include impacts of bushfire smoke on workers doing outdoor work on hazardous days and the community from major fires which represents both an occupational health and safety (OHS) and health hazard.

Using a full cost accounting model which includes “externalities” which may be avoided if the incidence of major fires is reduced implies a significant increase in the activities and budget of Fire and Emergency Management under the Department of Environment, Land, Water and Planning (DELWP) portfolio. The submission to the Victorian inquiry estimated annual supplementation of at least \$150 million p.a., in order to bring appropriations into line with the current fire risk management strategy.

Response, recovery and remediation costs should also be included as the opportunity cost of diversion of resources to the fire effort which, in other circumstances would be generating value to the nation elsewhere.

For example, in addition to the direct costs of the deployment of 900 professional ADF personnel in December, there has been the call up of all 6500 reservists (under Operation Bushfire Assist 2019-20¹⁷ in effect from 4 January 2020 until revoked by the Governor-General) on their allowance¹⁸ and associated remuneration and conditions of service under the call out order. Despite the January holiday period there is also an opportunity cost associated with both diversion from regular paid employment and in foregone output.¹⁹



¹⁷ <https://www.defencereservessupport.gov.au/call-out-orders/information-for-reservists/>

¹⁸ <https://www.goarmy.com/reserve/benefits/money.html>

¹⁹ Defence service rendered under a call out order is protected under the Defence Reserve Service (Protection) Act 2001, and employers must release a Reservist from their civilian employment to undertake this service without being compelled to use any type of paid or unpaid leave during the period of service. <https://www.defencereservessupport.gov.au/call-out-orders/information-for-employers/>

Source: <https://www.abc.net.au/news/2020-01-10/hazard-reduction-burns-bushfire-prevention-explainer/11853366>

A changing landscape

It is hoped that 2019-20 is not the “new normal” in terms of both the incidence of and total costs from natural disaster, however, in the absence of an urgent reappraisal of strategies and funding devoted to effective fire hazard management, it is difficult to forecast today any better outcome over the medium to longer term.

As has been admitted by Forest Fire Management Victoria (FFMVic) the management of bushfire across the Victorian landscape poses complex challenges for the Victorian Government as our climate, environment and communities change.²⁰

However, growing complexity demands greater resources to mitigate these challenges. Budgets need to align better with the needs on the ground. It is unclear whether actual and target residual risk scores in the fire “catchments” are meaningful. The risk of fragmentation of the more integrated approach needs to be considered if too many different objectives are being implemented in too many different communities with too few resources.

The AWU acknowledges that climate change is contributing to the extreme conditions which make wildfire more likely, however, it is important that climate change is not used as an excuse to do less rather than more hazard reduction and related activity. While climate change is the “new normal” it is not an excuse for inaction in undertaking hazard reduction.

There may be other supplementary techniques including more frequent use of indigenous “cool” burns to increase the tempo and timing of hazard reduction to an all-year round function.



²⁰ <https://www.ffm.vic.gov.au/research-and-publications/fire-research-and-adaptive-management-publications>

Source: Nature Conservancy Australia <https://www.natureaustralia.org.au/what-we-do/our-priorities/tackle-climate-change/climate-change-stories/fighting-fire-with-fire/>

Implications for policy – the reform agenda in Victoria

The Victorian submission identified a number of needed reforms such as more funding of FRBs and related activities and improved federal-state coordination made more urgent from the experiences in the 2019/20 fire season in order to reduce the likelihood of them recurring.

Indigenous land management practice based on cultural burning techniques is an area for further investigation to include in planning fire reduction work programs in a more integrated manner with more indigenous burns undertaken by skilled Traditional Owner practitioners.

Additional supplementation to the 2020-21 DELWP budget will be an important opportunity to get ahead of some of these pressures. The AWU is urging the Andrews Government to ensure that central agencies approve any departmental request for supplementation based on the experiences of the 2019-20 summer and reappraisal of the costs associated with the full implementation of the risk-based approach to hazard reduction from DELWP in the 2020-21 Victorian State Budget.

An important immediate priority for the AWU is responding to the destruction of logging resources as a consequence of the wildfires which are crucial for employment of VicForests' workers already under pressure from the Government's management plan phasing out forestry of native timber by 2030 and the \$120 million adjustment package after the completion and non-renewal of existing forestry agreements in 2024.²¹

A number of the remediation activities announced by the Victorian Government including fire-breaks, road clearing and site clearing are areas where VicForests workers should be given priority for employment.

Expanded fire hazard reduction and land management practices would also offer additional career prospects - especially for older workers facing more difficulty in accessing alternate employment outside the forestry sector - and in areas which would draw from the knowledge and experience of the one thousand VicForests employees in complementary areas.

Community engagement is important and can add value to fire hazard reduction, but to be effective, sufficient funding for specific activities tailored to separate

²¹ <https://www.theguardian.com/australia-news/2019/nov/07/native-forest-logging-to-be-phased-out-by-2030-as-victoria-plans-timber-transition>

regions will be required or a common denominator approach will dominate, reducing the effectiveness of the state-wide program based around the needs of the seven bushfire catchments.

The AWU's primary interest is ensuring that the interest of Victorian professional firefighters is both protected and promoted in their efforts to (safely) defend the state from the impacts of major fires. And it's not evident that the current budget is sufficient to achieve this.

The economic costs associated with wildfire are clear. Black Saturday was estimated to cost the economy \$4.4 billion in 2009 (\$5.3 billion in today's dollars). Current estimates of the economic cost of the wildfires of 2019/20 could be up to \$100 billion. The impact of local fires is being felt globally in additional CO2 emissions. Significant underfunding of hazard reduction activities has occurred in recent years, as the lessons of Black Saturday fade.

It will be important that a future commitment to risk reduction targets is met with commensurate funding to be in a position to achieve headline hazard reduction targets under the risk mitigation model.

Assuming adequate funding, centralised land management responsibilities under DELWP in Victoria should facilitate coordination among various functions and therefore should lead to more effective land management outcomes.

The value of that future commitment is not measured in a few million extra dollars but in tens of millions of dollars in manpower, equipment, integrated fire management practices including indigenous knowledge, and research if Victoria is expected to get ahead of the growing threat of wildfire to 2030 and beyond.

The major fires of 2019-20 serve as a reminder of the importance of FRBs and that a fully funded and integrated hazard reduction program is a vital investment to the "triple bottom line" of both Victoria and the nation. The AWU stands ready to play its part.

There will be a number of additional conclusions which will contribute to more effective hazard management which will be relevant to ongoing debates and in any likely review of the circumstances surrounding the current wildfire experiences in Victoria and across the nation, including the NSW inquiry and this National Royal Commission into the 2019-20 crisis.

Improved coordination between states (and agencies) and the federal government

As compelling as many of the arguments are for supplementation of the fire hazard reduction program, they are dependent on the preparedness of relevant jurisdictional authorities to both prioritise hazard reduction activities and to fully fund them.

Experience over the last decade indicates that there is much more to do to effectively integrate both land and air resources across borders as well as integrating indigenous land management knowledge and practices of Traditional Owners which can supplement the efforts of jurisdictional fire agencies.

The bottom line is the twin challenges are wholly dependent upon governments' to fully fund both current and additional activities where the tempo of fire hazard reduction is only going to increase in an era of accelerating climate change.

The Productivity Commission's annual Report on Government Services 2020²², in particular, chapter 9, Emergency Services for Fire and Other Events, is a good place to start the reform process. For example, table 9.4 of the annual report indicates the number of agencies involved in land management across the states and territories:

New South Wales (5); Victoria (1); Queensland (2); Western Australia (1); Tasmania South Australia (2); Tasmania (1); Australian Capital Territory (1); Northern Territory (2).²³

Lack of sufficient coordination between the states (and inter-agency) and the federal government is an obvious area for change to expedite hazard reduction and fire suppression. Too often the rather than ending up in a "blame game" of who is responsible for what. Megafires do not recognise state boundaries and nor should relevant authorities in planning for hazard reduction and fire suppression.

Cross-border coordination of systems, personnel and equipment, including aircraft seems axiomatic but clearly lacking federally. This should be a key responsibility of the Council of Australian Governments (COAG) coordinated by the federal government in cooperation with the states and territories (still retaining their primary

²² Productivity Commission: Report on Government Services, The annual Report on Government Services (RoGS) provides information on the equity, effectiveness and efficiency of government services in Australia. <https://www.pc.gov.au/research/ongoing/report-on-government-services>

²³ <https://www.pc.gov.au/research/ongoing/report-on-government-services/2020/emergency-management/emergency-services>, p10

role in fire and land management) and their various agencies rather than assistance being solely determined (and limited) by state boundaries and hamstrung by incompatible communications systems and lack of access to equipment.

When done effectively, prevention programs reduce the likelihood of the emergency gap-filling Commonwealth intervention of the ADF and by thousands of volunteers in functions such as evacuation and land clearing and knock-on reconstruction and recovery roles and other functions undertaken by the states at enormous public expense.

These types of reactive responses are potentially avoided through an appropriately resourced, coordinated and well-planned preventative, fire hazard reduction program. Similarly, the negative economic impact on regional economies (and the state) of wildfire is reduced or avoided altogether.

A national aircraft fleet

Recent experience in combating fires nation-wide highlights the importance of a coordinated federal / state plan governing the access to and deployment of a properly resourced aircraft fleet. The federal government should appropriately take responsibility to procure the fleet (including from jurisdictions offshore) on behalf of the states and for the states in combination with the federal government to fund the program. This should be a priority for COAG.

The 2009 Bushfires Royal Commission considered the matter a decade ago and two points about the effectiveness of water-bombing and enhanced coordination, respectively:

The best opportunity to bring a bushfire under control is at or near the point of ignition, when the fire is small. The role of first attack is to contain the fire swiftly and minimise the risk to life and property. This is particularly important on days of extreme fire danger, when initial attack might be the only opportunity for containing a fire. Aircraft are an integral part of initial attack and, together with ground crews, provide continuing support during an extended fire. Depending on where they are stationed and their dispatch protocols, aircraft can often get to a fire and start the initial attack before ground crews arrive.²⁴

The Commonwealth owns and controls aircraft that could be used for firefighting. Before the 2009–10 fire season it held an operational briefing, outlining its resources and capabilities to the states and territories. The Commission considers, however, that cooperation between the State and the Commonwealth would be strengthened by an agreement that allows Commonwealth aerial resources to be automatically

²⁴ http://royalcommission.vic.gov.au/finaldocuments/summary/PF/VBRC_Summary_PF.pdf, p9

*incorporated in the State's preparedness planning and, where available, used on days of high fire risk.*²⁵

The National Aerial Firefighting Centre (NAFC) has 140 aircraft at its disposal and powers to access hundreds more. The NAFC coordinates the aerial fleet of federal, state and territory governments.²⁶ However, despite calls in November 2019 to access firefighting aircraft from both Canada and the United States, not enough appears to have been done to procure them and to have them at hand to combat the (looming) fire emergency.²⁷

Federal Labor leader Anthony Albanese supported those calls but Prime Minister Morrison rejected them, insisting the Coalition already had a national plan. Subsequently, the "national plan" was simply to respond to the various needs of the states after implementing an inquiry into the adequacy of their response²⁸. Given the scale of the growing fire risk evident well before the current fire season and calls for action the lack of national leadership looks culpable.

The federal government announced in mid-December 2019 an additional \$11 million to assist fund activities of NAFC. The funding boost was announced after former Liberal Prime Minister Malcolm Turnbull said in early December the Coalition needed to coordinate an Australia-wide response to the emergency.

And another \$20 million was announced on 4 January 2020 to urgently procure water-bombing aircraft from the United States and Canada but in critical days along the fire front they were delayed in deployment because of the Canadian winter, tornadoes along the Gulf Coast and a volcanic eruption in the Philippines.²⁹ These delays could have been avoided if the aircraft had been procured in November 2019 as recommended by the fire chiefs and Labor. Leasing costs at short notice have also increased since that time. NAFC is now also reportedly scrambling to lease planes from France and Malaysia.³⁰

²⁵ http://royalcommission.vic.gov.au/finaldocuments/summary/PF/VBRC_Summary_PF.pdf, p10

²⁶ <https://www.abc.net.au/news/2019-12-12/federal-government-announces-aerial-firefighting-boost/11790862>

²⁷ <https://www.theguardian.com/australia-news/2019/nov/15/victoria-isnt-burning-but-it-will-australias-fire-chiefs-fear-fatigue-will-take-terrible-toll>

²⁸ <https://www.smh.com.au/politics/federal/political-stunt-federal-government-launches-bushfire-inquiry-to-probe-state-policy-20191223-p53mh3.html>

²⁹ <https://mobile.abc.net.au/news/2020-01-15/firefighting-aircraft-delayed-by-international-disasters/11869676?pfm=sm&pfmredir=sm>

³⁰ <https://www.abc.net.au/news/2020-01-16/bushfire-fighting-planes-unable-to-get-to-australia-from-canada/11871384>

A major lack of planning and coordination is illustrated by aircraft sitting on the ground in QLD which could be being deployed to assist in the fire fight in both Victoria and NSW.

The current system where states are allowed to operate in silos and only work together in a reactive, piecemeal fashion is inefficient, unsustainable and unjustifiable. This would seem to be an obvious opportunity for the federal government to provide leadership in dealing with the current challenge. There is scope to develop a national firefighting aerial fleet with coordination by the federal government co-funded with the states.



Near Bairnsdale, East Gippsland, <https://www.bbc.com/news/in-pictures-50971879>

Conclusion

AWU firefighter members are always first to assist in emergencies. When this is as a consequence of a lack of planning, coordination and funding by all governments, it is unacceptable to expect so few members (and their families) spread across vast areas of Australia to shoulder such a large burden, so far away from decision makers in Sydney, Melbourne, or Canberra.

The AWU will continue to campaign throughout 2020 for a considered and appropriate response by both the NSW and Victorian State Governments to the issues raised in this submission following the 2019-20 fires in time for the 2020-21 fire season commensurate with the effort and sacrifice our members have made.

To this end, the AWU stands ready to cooperate with the National Royal Commission and in further discussions with the federal government on how best the AWU may be able to also assist. A number of possible areas for enhanced coordination and funding have been raised in this submission to this end.