



**Victorian
Farmers
Federation**

SUBMISSION

Delivering Bushfire Reform

9 July 2021

EXECUTIVE SUMMARY

For five years the VFF has been advocating for a universal understanding of ‘life and property’ across all emergency management. Without a single understanding any risk and consequence model will build in bias. Currently an urban bias is present in Victorian emergency management. This comes at the expense of agriculture that comprises approximately two thirds of Victoria.

To assist in improving the understanding the impact of wildfire and fire management activities on agricultural businesses the VFF is making the following recommendations.

Recommendations

1. All the State Emergency Management Priorities (SEMP) definition of ‘life and property’ be adopted by all agencies involved in risk and consequence modelling, preparedness, response and recovery issues.
2. Expert knowledge on all aspects of property is available to incident controllers.
3. That fire preparedness be based on consideration of risk and consequence to all aspects of life and property.
4. The PHOENIX Rapidfire model be amended to consider all elements of ‘life and property’ in risk and consequence assessments.
5. The Agricultural industry be involved in developing the data requirements for agricultural commodities and how risk factors should be modelled.
6. That expert advice and input from experts in all relevant aspects of life and property be sought in preparation of preparedness strategies.
7. That expert advice and input from experts in all relevant aspects of life and property be sought in incident control and recovery, potentially through the use of EMLOs from bodies such as the VFF.
8. That Incident Controller training include specific understanding of risk and consequence relating to all aspects of property.
9. That post impact assessment processes are prompted to document all aspects of property.
10. That post impact assessors are trained in relation to identification of impacts on agricultural commodities.
11. That DELWP seek external review / audit of their processes, models and systems in relation to their ability to consider all aspects of life and property.

Delivering Bushfire Reform is an opportunity for DELWP to consider how it can ensure that risks are managed to reduce the likelihood of a landscape level fire and reduce the consequence when they occur. Having many agencies operating under different statutes can make it difficult to ensure all agencies have a shared understanding of life and property. Agriculture is the least represented property value in relation to key fire agency / Department priorities and expertise. Improving knowledge systems, including annual assessment of systems, processes and procedures ability to achieve a balanced life and property outcome should be considered.

Farmers as members of the CFA often prioritise the community over protecting their farm businesses. It is only fair that the risk and consequence of fire on their livelihood is understood and considered in emergency management.. The following excerpt from a 2017 letter from the President to VFF to Emergency Management Victoria remains relevant:

.. the failure to clearly define ‘property’ is having real consequences for the ability of the agriculture sector to prepare, respond and recover from emergencies. I am also offering some simple solutions which will improve Victoria’s disaster preparedness and response.

Definitions of emergency and fire relate to, amongst others, “extensive damage to property”. It is our experience that responder agencies often interpret this as protection of the dwelling. The State Emergency Management Priorities also support a broader interpretation as there are a range of issues relating to “property” which includes “assets supporting individual livelihoods and economic production” and “critical infrastructure and community assets”.

Our members report issues relating to poor understanding of the presence of both critical infrastructure and property that supports livelihoods and economic production in rural areas. Until landholders are able to identify the “assets supporting individual livelihoods and economic production” incident controllers will not have the information available to determine priorities for protection and the default protection to a dwelling will continue. This undervalues the impact of loss of stock, fences, machinery, soil structure and agricultural infrastructure on regional economies in considerations at all stages of the emergency management cycle.

The consideration of ways to provide better intelligence to Incident control centres so that information on the location of ‘critical infrastructure’ and infrastructure and property which supports production can be readily available during an event Agencies could improve how they work with farmers to identify the key assets and property to be protected in various events – and the priority for protection.

This submission builds on these raised in 2017 and describes how the VFF can assist DELWP and other control agencies better understand and manage the risk to life and property from bushfire.

OUR POSITION

Universal understanding of life and property

In seeking input to this process, DELWP referred to ‘*Safer Together*’ and PHOENIX Rapidfire models. No reference was made to the Emergency Management Actⁱ (EM Act) or the *State Emergency Management Priorities* (SEMP). This is concerning to the VFF as the SEMP refers to 4 types of ‘property’ including ‘*Protection of assets supporting individual livelihoods and economic production that supports individual and community financial sustainability*’ which includes farmsⁱⁱ.

VFF is concerned that the *Safer Together* material does not recognise infrastructure, environment and business in the meaning of property. It states, in relation to risk, “*it is important to understand the impacts of bushfires to not only life and property, but to infrastructure, the environment, businesses and communities. Because PHOENIX Rapidfire models risk to the Safer Together understanding of property, it only considers impact to dwellings is modelled and does not allow a consideration of other property risks or impacts.*

Dwellings are a good indicator for risk to life in residential and rural areas. It is when a dwelling is the main indicator of property damage that urban bias occurs. If a dwelling is lost in an urban area that is a key impact. If a dwelling, sheds, fences, machinery and livestock / crops are lost in a rural area, there are additional impacts on livelihood. When faced with choices of what to protect, farmers often say the house is easier to insure, replace / work around than the loss of their ability to earn an income. For instance, damage to your soil is not insurable and very costly and time consuming to overcome, as is loss of genetics.

If these risks are not modelled the management system has a blind spot. It is critical that information is collected to understand economic, utility and environment risk and that expert knowledge is sought through all stages of the emergency management process.

Recommendations

1. All the State Emergency Management Priorities (SEMP) definition of ‘life and property’ be adopted by all agencies involved in risk and consequence modelling, preparedness, response and recovery issues.
2. Expert knowledge on all aspects of property is available to incident controllers.

Embedding understanding of life and property at all stages of emergency management

Achieving a standard and comprehensive understanding of life and property is not a solution unless it becomes business as usual. This shared understanding must underpin the decision support system to ensure appropriate consideration of competing priorities.

Recommendations

To achieve this the VFF makes the following recommendations:

3. That fire preparedness be based on consideration of risk and consequence to all aspects of life and property.
4. The PHOENIX Rapidfire model be amended to consider all elements of 'life and property' in risk and consequence assessments.
5. The Agricultural industry be involved in developing the data requirements for agricultural commodities and how risk factors should be modelled.
6. That expert advice and input from experts in all relevant aspects of life and property be sought in preparation of preparedness strategies.
7. That expert advice and input from experts in all relevant aspects of life and property be sought in incident control and recovery, potentially through the use of EMLOs from bodies such as the VFF.
8. That Incident Controller training include specific understanding of risk and consequence relating to all aspects of property.
9. That post impact assessment processes are prompted to document all aspects of property.
10. That post impact assessors are trained in relation to identification of impacts on agricultural commodities.

Independent Oversight

Previous Royal Commissions have highlighted the need for seamless response by agencies and decisions to not be politicised or influenced by considerations outside property response. Since the dismantling of the Forest Commission Victoria the control of fire on public land has been performed by DELWP. A form of external to DELWP oversight of operational practices and systems in relation to achieving *Emergency Management Act* outcomes would improve transparency and facilitate continuous improvement in the system through better understanding of risk and consequence. The role of EMV and the Inspector General Emergency Management (IGEM) could be expanded to assess opportunities to achieve better consideration of life and property at all stages of emergency management.

Recommendation

11. That DELWP seek external review / audit of their processes, models and systems in relation to their ability to consider all aspects of life and property.

Previous submissions

To assist in the understanding of the issues outlined in this submission four previous submissions and a two page document looking at improvements across the 3 stages of emergency management are attached.

CONCLUSION

Improving understanding of risk and property is a key priority area for the VFF. We would welcome the opportunity to work with DELWP to implement these key recommendations.

Emma Germano
President
Victorian Farmers Federation

APPENDICES

Councils and Emergencies

Strategic Bushfire Engagement

Submission to the Natural Disasters Royal Commission

Submission to the IGEM Review of 2019-20 Bushfire Season

Bushfire – Prevention to Recovery Suggestions

Letter – Definition of Property

The Victorian Farmers Federation

Victoria's agricultural production accounts for over \$16 billion of Victoria's economy and over 25 per cent of the State's exports per annum. Victoria's farmers produce high quality food and fibre, produced to high standards of safety, with little taxpayer support, and to some of the strictest environmental and highest animal welfare controls in the world.

The Victorian Farmers Federation (VFF) represents a farming community which creates a profitable, sustainable and socially responsible agriculture sector connecting with consumers.

We have a proud history representing Victoria's farm businesses since 1979 – primarily family farms that produce the eggs, grain, fruit and vegetables, meat, and milk that help to feed Victoria's six million people, and the bigger global community, every day.

The VFF consists of commodity groups: dairy (United Dairyfarmers of Victoria), grains, horticulture (including Flowers Victoria), intensives (chicken meat, eggs and pigs), and livestock – and expert committees representing; water, land management, agricultural and veterinarian chemicals, farm business and rural development, and workplace relations.

Update.

Endnotes

ⁱ Definitions from the Emergency Management Act

major emergency means—

(a) a large or complex emergency (however caused) which—

(i) has the potential to cause or is causing loss of life **and extensive damage to property**, infrastructure or the environment; or

(ii) has the potential to have or **is having significant adverse consequences for the Victorian community or a part of the Victorian community**; or

(iii) requires the involvement of 2 or more agencies to respond to the emergency; or

(b) a Class 1 emergency; or

(c) a Class 2 emergency;

major fire means a large or complex fire (however caused) which—

(a) has the potential to cause or is causing loss of life and extensive damage to property, infrastructure or the environment; or

(b) has the potential to have or is having significant adverse consequences for the Victorian community or a part of the Victorian community; or

(c) requires the involvement of 2 or more fire services agencies to suppress the fire; or

(d) will, if not suppressed, burn for more than one day;

ⁱⁱ The State Emergency Management Priorities are:

- Protection and preservation of life is paramount. This includes
- Safety of emergency services personnel; and
- Safety of community members including vulnerable community members and visitors/tourists located within the incident area
- Issuing of community information and community warnings detailing incident information that is timely, relevant and tailored to assist community members make informed decisions about their safety
- Protection of **critical infrastructure and community assets** that supports community resilience
- Protection of residential property as a **place of primary residence**
- **Protection of assets supporting individual livelihoods and economic production that supports individual and community financial sustainability**

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- *Protection of environmental and conservation assets that considers the cultural, biodiversity and social values of the environment.*