



## IPSGroup Pty Ltd

28 April 2020

The Royal Commission into National Natural Disaster Arrangements  
Locked Bag 2000  
Manuka ACT 2603

Dear Commissioners

As outlined in the Letters Patent signed by the Governor-General of the Commonwealth of Australia on 20 February 2020, IPSGroup Pty Ltd makes the following submission.

Is Australia Ready for Public, Private Partnerships in National Natural Disaster Arrangements including Disaster Preparedness and Response, Education and Training. IPSGroup is ready.

While this submission is written with a focus on bushfire management and disaster response, the recommendations have a wholistic outcome having as much relevance to other disasters such as cyclones, floods, storms, droughts etc.

The opening remarks at the commencement of the Royal Commission included a comment that the Commission would focus on lessons learned from the Bushfires of 2019-2020, rather than blame. To understand lessons learned it is necessary to understand where the success and failures exist in the current disaster preparedness and response systems around the country, as legislation and the disaster preparedness and response frameworks are different across the States and Territories, some more efficient than others. Evidence shows there have been significant changes to land management and environmental practices from the early 1980's, decreases in preparedness, management and resource budgets over the past 20 years, and significant growth in volume of crown land, national parks and forests that are locked up.

Does Australia need a change in National Disaster Arrangements? We believe so. Solutions exist to reduce the impacts of natural disasters on the community through preparedness, mitigation and resilience activities. Are the Australian people ready for a change? We believe so. Are the three levels of Government? Time will tell.

Managing a coordinated approach to disaster preparedness and response across Australia is a complex ambition with Australia being a Federation of States and Territories, governed by elected officials over 3 tiers of Government, commencing with the Commonwealth, the 6 States, 2 Territories and approximately 537 Local Government Authorities. At each level of government there exists multiple pieces of legislation covering environmental, wildlife and land protection matters alongside development, planning and building codes administered by local government authorities.

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As there is complexity which arises from three levels of Government and areas of law which the Commonwealth has no jurisdiction over, with these being the remit and responsibility of States, Territories and Local Government Authorities, the primary question is “Does Government, Commonwealth, State, Territory and Local have the will to make real, long term changes? Presently there is no mechanism to do so and a review of past national disasters and the implementation of recommendations from earlier Royal Commission’s would suggest not.

The current Royal Commission will review the work and recommendations of previous inquiries. For this to be meaningful the Commission will need to review the recommendations previously made, to what recommendations were implemented and those that were not. Measuring the results and effectiveness of the implemented recommendations, attempting to understand what the impact to the 2019-2020 bushfires would have been should the disregarded recommendations had been built-in, is important for the public to understand. The challenge to this Commission will be how to ensure the recommendations made are treated with the seriousness they deserve, whilst being substantial enough to bring about change, otherwise this process is another waste of time and of public funds.

The calling of a Royal Commission by the Commonwealth Government in an attempt to alleviate public concern and attempt to show consistent accountability will fail unless there is real national change and structural reforms across administration matters, policies, legislation, standards, accountabilities and reporting measures and frameworks. The lessons learned will show there is a clear failure across the three levels of Government in the practical (not theoretical, as all levels of government will state they have policies and procedures in place) coordination of risk management, disaster preparedness and response across the country.

If past lessons show Government departments across the state and territories failing to be held accountable for disaster preparedness and mitigation then the responsibility for managing the National Disaster Management Framework will need to be transferred to an independent third party which incorporates bushfire management practices and other forms of disaster preparedness and response. This will provide the public transparent with responsibility and reportable accountability measures.

In any conversation and review there will be extremes on both sides of the argument. With a balanced and collective review of evidence, advice and opinions provided by both hands on practical experiences, experts and science, it is possible to find the middle road and develop a new national set of frameworks for Australia to be proud of.

As outlined in greater detail below we make the following recommendations:

1. Changes are required to the Australian legal framework for responses to national emergencies, providing the Commonwealth increased powers when responding to disasters alongside the provision of funding for disaster preparedness and mitigation endeavours.
2. The creation of a permanent National Cabinet incorporating responsibility for National Natural Disasters.
3. Structural reforms establishing a National Disaster Management and Response Framework. This should be managed by an independent organisation, responsibilities include:
  - a. Review the national Risk Management Framework for Bushfire and other Natural Disaster management.
  - b. Conflicts between legislation identified and rectified and inconsistency between states.
  - c. National set of standards for disaster management mitigation and response including detailed bushfire management activities addressing the mapping of fuel load production by region, standard fire response for fire size, region, accessibility, etc.
  - d. Standardised administration, policies, legislation, accountabilities, reporting measures across all states and territories.
  - e. Permits to remove fallen timbers and the select removal of some species from crown land and forests and a review of accessibility and activities in national parks, crown land and forestry assets.

- f. Consistent accountability and responsibility across states and territories.
  - g. Monthly reporting framework against the national standards with defined measurables by state and territory.
4. Public private partnerships allowing external contractors to provide disaster preparedness, response, management surge capacity and emergency response activities.
  5. Centralised grants system across all levels of government for national disaster preparedness, mitigation and resilience initiatives and activities within the community.
    - a. Sharing of initiatives and improvement activities with other regions, will improve the value for money proposition.
    - b. Providing greater opportunity for commercial organisations to provide community disaster preparedness and resilience activities.
  6. Investment in and the centralised use of enhanced technologies, simulation and modelling capabilities which can provide real time, adaptive solutions based on short and long term forecasts.
    - a. Establishment of a national centralised disaster response centre.
  7. Changing existing building codes and land zoning rules to minimise poor planning and policy decision having impacts in future disaster events. This will include:
    - a. Changes to the building codes for fire prevention measures.
    - b. Land zoning rules as to where property can be built in taking into consideration flood and fire mapping.
  8. The introduction of regular audits for all local government authorities, states and territories to the national disaster preparedness, mitigation and response standards, providing clear accountability. This allows any weaknesses and non-compliance to be identified quickly with appropriate risk mitigation activities completed, minimising the opportunity of a major disaster event occurring.
  9. Reintroducing grass roots knowledge incorporating Indigenous Australians cold burn methodologies and previous forestry land management practices in controlling forestation fuel loads.

### **1. Development and implementation of adaptation actions to address the consequences of longer, hotter, drier seasons and severe weather events.**

Australia has strong experience alongside showing how it can be adaptable when dealing with cyclones and floods, amending preparedness, mitigation and response strategies from lessons learned in previous events. This in part may be a result of quality information and science tracking climatic conditions with fewer consequences in having legislation changed on disaster preparedness measures. With cyclones and floods, Australia has learned to change its building codes, approvals and land zoning rule. Queensland would be a good example of how this adapted process can work, with changes in land zoning around Brisbane as a result of the 2011 floods, and the contribution which can be made by research work completed by organisations like James Cook University in collaboration with Suncorp Insurance.

Has our response to bushfire management practices changed in the past 30 years in line with changes in weather conditions? Or have bushfire management practices reduced when climate variability conditions have increased, allowing the inverse curve on the disaster preparedness graph to be furthest away from each other than they have ever been?

Whether a person is a climate change believer or denier, in recent years Australia has experience longer, hotter, drier seasons with abnormal weather events. Climate change variability, new technology and practices do not change the fact; forestation produces litter. Accepting climate variability is occurring, what resourcing, legislative, risk management and disaster preparedness changes have been made? Bushfires, like pandemics do not have borders. All changes have to be consistently applied across the country to be effective.

Adaptive acts form the basis of risk management practices, disaster preparation and mitigation activities. Adaptive actions require changes to resource allocations, budgets, legislation, environmental management practices, land clearing and fire break planning, undergrowth control, the accelerated removal of fuel loads,

planning and building codes. Australia is of a size and maturity where it can incorporate a systematic and coordinated surge capacity task force of responders and equipment moving seamlessly between states on a temporary or permanent basis. In the next 5 years it is estimated that up to 25% of emergency services personal will be retiring from the state based services leading to a significant loss of knowledge. This will put increasing pressure on the remaining professionals and services provided within the community.

Adaptable practices require reliable, short and long term forecasting/modelling data which allows changes to be adopted if the risks indicate it necessary. Organisations such as the CSIRO and the Bureau of Meteorology (BOM) provide such information. The BOM already provides fire danger ratings by district. Modelling needs to cover each local government authority area for effective disaster planning, mitigation work and response resourcing. To have effective modelling, requires consistent and high quality data. Australia does not have a consistent methodology of estimating the changes in forestation, fuel load growth per year and the actual volume burned in a given year.

## **2. Focus on national coordination, conducted jointly between the Commonwealth, State and Territory Governments to give Australians confidence that natural disaster coordination arrangements are the best possible.**

Until the COVID-19 pandemic the ability of the Commonwealth, State and Territory Governments to work collectively was poor. The introduction on 15 March 2020, of the Prime Ministers first ever National Cabinet, bringing together the Premiers and Chief Ministers of the States and Territories concurrently to coordinate the national response to COVID-19, did spark optimism that the Commonwealth, States and Territories could and would work together. This process is only possible and held together at the collective will of the Premiers and Chief Ministers. Six weeks into this process the personal agenda of some State Premiers' is starting to fracture the good work of the collective group. There is no legislative opportunity available for a coordinated approach with the Commonwealth having no powers in directing the States and Territories.

In regard to the Disaster Management Framework it is, the responsibilities of the States and Territories to manage disasters which impact on their state of territory. There are mechanism's in place for the States and Territories to call on the Commonwealth for assistance. It is the responsibility of the States and Territories to do this. Until this is done the Commonwealth have limited powers to act. The recent Bushfires of 2019-2020 draw attention to the deficiencies in how some states responded to the disaster, the speed and urgency of their response and lack of coordination which failed to meet community expectations and that of the Commonwealth. Once the Commonwealth was called on, the systems to coordinate between some states and the commonwealth failed. This shows poor planning and response capabilities of the states involved and their risk assessments and response protocols.

Lessons can be learned from those States and Territories who regularly have significant natural disasters. The systems and protocols are in place for the immediate coordination of response between the State, Territory and Commonwealth. Queensland and the Northern Territory are good examples of this.

## **3. The responsibilities of the Commonwealth and State, Territory and local Governments relating to preparedness for, response to, resilience to and recovery from, natural disasters.**

Statistics show for every \$1 spent on preparedness the savings in response and recovery is between \$5-\$7. The money spent on preparedness needs to be effective.

Each level of Government spends millions every year on disaster preparedness. There is no available information on how much is annually spent across all levels of government and the effectiveness of this investment. Furthermore, it would be of value to know the amount spent across all levels of government over the past 30 years in disaster response activities.

The Commonwealth expects the states and territories to be prepared. States and Territories expect the local government authorities to be ready, having the right level of knowledge and expertise to have appropriate risk mitigation, disaster response and management plans in place. There needs to be an independent third party who has the authority to audit and rate each local government authority's disaster management and response plans and issue compliance breaches where deficiencies exist (against a national framework).

Australia has a National Resilience Taskforce under the Australian Government Department of Home Affairs. In June 2018, this task force completed the National Disaster Risk Reduction Framework in conjunction with 100+ participants from a diverse range of 80+ organisations. By way of background, in 2015 the Sendai Framework for Disaster Risk Reduction 2015-2030 was adopted by Australia and other members of the United Nations. It was acknowledged that reducing disaster risk is critical to supporting communities and economies to be resilient when a shock occurs. The National Disaster Risk Reduction Framework was the result of adopting the 2015 Sendai Framework. Disaster resilience and risk reduction is a coordinated approach and shared responsibility. Individuals and communities have their part to play however government and industries must take coordinated action to reduce disaster risk within their control. If local government, states and territories are taking away the ability of individuals and communities to manage their fire risks, these governments have a higher duty of care to the public and community.

The National Disaster Risk Reduction Framework stated "More than ever, limiting the impact of disasters now and in the future requires a coordinated effort across and within many areas including land use planning, infrastructure, emergency management, social policy, agriculture, education, health, community development, energy and the environment". We would ask if this is another motherhood statement and box ticking exercise, where there is no true intent to implement this framework? In light of the recent and current national disasters and this Royal Commission the National Disaster Risk Reduction Framework should be reviewed, with the outcomes changed or reprioritised acknowledging the legal complexities between the responsibilities of the Commonwealth, States, Territories and Local Government Authorities.

**4. The coordination between the Commonwealth and State, Territory and Local Governments relating to preparedness for, response to, resilience to and recovery from, natural disasters and what should be done to improve these arrangements including the sharing of resources.**

The Australian governments do not clearly explain the role and responsibilities between the Commonwealth, State, Territory and Local Governments when concerning disaster preparedness and mitigation, response to disasters, resilience programs available or opportunities to improve as part of the recovery from natural disasters. It is understandable for the Australian public to be confused, and further there is no clear explanation to the community what the coordination protocols are between the Commonwealth, State, Territory and Local Governments relating to preparedness for, response to disasters and resilience programs which are available to assist recovery from natural disasters. No doubt the experts say they exist.

If the public clearly understood the roles played by each level of government, the resources available and how and when they will be utilised during a disaster, they would have greater confidence in the ability of Government to provide assistance when and where it is needed. Community expectations change for each period in history. Unfortunately, some Governments are slow to respond and change with these expectations.

The Commonwealth, State and Territory governments need to tap local grass roots knowledge which exists in each community when it comes to how disasters move through and impact a specific region. It is not appropriate for city people to make decisions on behalf of regional and rural Australia, without the actual knowledge and experience that these landowners have. The bushfires of 2019-2020 have proven the incident management protocols and systems in place for local communities to provide real time information failed. This included a failure in who would complete the response activity in some areas and

what equipment was used versus what was requested. Each state and territory operate under different response systems and rules which operate between paid and volunteer professionals. If disfunction exists between these two labour sources then the community loses out and resilience is harder to build as there is no trust or faith in the system to provide a safety net to the community. One solution is the establishment of a single, national control centre for disaster response and management which incorporates disaster response across all emergency services functions, providing a clear communication change of responsibility between Commonwealth, State, Territory and Local Government responses.

## **5. Arrangements for improving resilience and adapting to changing climate conditions.**

The 'quite Australian' has lost confidence in the Government's ability to improve resilience within the community. Local Government Authorities across Australia complain they do not have the resources to undertake some basic services, let alone disaster resilience activities within the Community. Some Local Government Authorities apply for and use grant funds to introduce resilience improvement activities within their community. The process to apply for a State or Commonwealth grant in many situations is a time consuming process and some local government authorities lack the experience and resources to apply for grants. Secondly, the funds available for resilience grants are relatively small compared to the need and areas where improvements could be made. Thirdly, the majority of grants available exclude commercial companies from applying, if they do, the selection criteria exclude many during the review process.

To improve resilience within the community taking into account changing climate conditions there needs to be:

- a) A review of grant funding at the Commonwealth level with a centralised grant application system for the country based on each Local Government Authority. With clever planning and information sharing, grants and improvement initiatives made in one community may be of value and transferrable to other communities around Australia. The current disconnection between the States and Territories grant systems and the Commonwealth promotes waste and inefficiencies within these programs.
- b) Opening up grants to a greater number of commercial organisations who have experience in disaster management and resilience building can provide programs which can be rolled out and used across the country.
- c) If national charities are awarded funding from one state for resilience programs, the programs developed are provided to other communities for use free of charge.

## **6. What actions should be taken to mitigate the impacts of natural disasters.**

Risk management and disaster preparedness requires action and is the responsibility of all, from individuals to businesses through to governments. With the different levels of government, the disjointed system of responsibility and the ability to make changes at an individual or business level low, the current system is not working. There needs to be a national framework which allows for practical public policy.

Investments in world class integrated emergency response technologies exist. We need to move from state based systems to a national platform where the emergency services departments of each state and territory use the same system, providing a fully integrated national network of real time information.

The advance of scientific systems and information is critical to the future success of disaster mitigation. It is important to identify which systems add the best value to the national conversation. Having up to date information allows notification through a coordinated framework that risk management plans need to be reviewed and updated for medium to high risk zones. With advancing technology, many of these alerts can be automated with algorithms analysing available information.

## **Individuals**

Individuals have limited opportunity to take preventative action to mitigate the impacts of natural disasters. When it comes to land management activities, these are restricted by local and state based legislation and planning rules. The one area individuals can make a change is having in place Family Emergency Preparedness Plans. The current uptake in Australia is low. For all the resources available and the advertising undertaken each year aimed at family's preparing for the summer storms etc, there has been little success in the message being received. The definition of madness is doing the same thing time and time again. There needs to be a change in the approach and messaging used by Government and Industry in promoting disaster preparedness planning in homes.

Around the home, individuals can maintain their properties to reduce damage done by storms etc. For anything more, control has been taken away. New homes should have a universal set of building codes which deal with storm and fire ratings. With respect to pre-existing property, universal grants should be provided to all property owners in high risk areas to make changes for both storm and fire damage. In Northern Queensland through the initiatives of insurance companies and follow up research provided by James Cook University; grants were provided to homeowners to make a set of changes to their properties to mitigate storm damage. Claim's history subsequent to these improvements showed a reduction in payouts. This proved that for every \$1 spent in prevention and mitigation there was a benefit with the reduction of disaster response costs with fewer claim payouts and/or lower claim amounts.

## **Business**

All businesses are required to have fire evacuation plans, yet they are only encouraged to have disaster management plans in place to provide protection for their property, employees and business continuity. There is an opportunity to make improvements in this area. There is little else businesses can do when it comes to mitigating the impact of natural disasters, other than being ready and prepared.

## **Local Government**

Local Government has significant responsibility in mitigating the impacts of natural disasters within their communities. From planning, to zoning and have appropriate knowledge, plans and resources in place to respond. Government need to understand where gaps exist in this area. A national standard could be established with each state and territory responsible for auditing each local government authority, say every 3 years against a set of standards. Any deviations from the standard would require follow up work to be completed (maybe forcing them to annual reviews) and follow ups where the local government authority has to consistently show improvement before moving back to 3 year reviews. Examples of such programs already exist in some education departments for the reviews of every school across a state. For example, Queensland has such a system in place.

## **State Government**

Each state and territory is responsible for disaster mitigation in their respective state or territory. There needs to be a national framework and set of standards expected for each state or territory to meet. As discussed earlier there already exists the National Disaster Risk Reduction Framework managed by National Resilience Task Forces. This task force could be expanded to introduce a set of standards which each state or territory is required to meet.

## **Federal Government**

The opportunity for Commonwealth is to establish a national framework and set of protocols which all levels of government are to operate under. In line with each local government authority being audited, each state or territory should be subjected to a full audit by the Commonwealth.

The benefit for having clear national standards which all levels of government are subject to, will provide greater confidence in Government and enhance resilience in the community. Failures within the system can be quickly identified and fixed with the appropriate area held accountable.

**7. Whether accountability for natural disaster risk management, preparedness, resilience and recovery should be enhanced and whether there should be a nationally consistent accountability and reporting framework with a national set of standards.**

We believe there should be a nationally consistent accountability and reporting framework and a national set of standards. Australia already has examples of this working to varying degrees of success in the Training, Education and Health sectors. The best of each could be combined into a framework suitable for natural disaster risk management, preparedness, resilience and recovery with an accountability and reporting framework to a national set of standards.

A national framework would provide standardisation of equipment, expansions in surveillance and mapping capabilities and integrate the best technology can offer.

For example, there is a lack of accountability when clearly identifying how the majority of bushfires start for the public. The public deserve to know whether a fire starts because of:

- a) Arson
- b) Powerlines sparking
- c) Lightning
- d) Carelessness of the public
- e) Control burns getting out of control

**8. Should there be changes to Australia's legal framework for the involvement of the Commonwealth in responding to national emergencies, including:**

- a. **Thresholds for, and any obstacles to, State or Territory requests for Commonwealth assistance.**
- b. **Whether the Commonwealth Government should have the power to declare a state of national emergency.**
- c. **How any such national declaration would interact with State and Territory emergency management frameworks.**
- d. **Whether in the circumstances of a national declaration, the Commonwealth Government should have clearer authority to take action (including, but without limitation, through the deployment of the Australian Defence Force) in the national interest.**

We believe that there should be changes in the legal framework to allow the Commonwealth Government to take a broader role in disaster mitigation, preparedness and Response. Local, State and Territory governments seek the Commonwealth for funding, support and compensation. To have this level of support the Commonwealth should have broader powers to ensure the best systems are available for fast, effective and efficient response. There are far more knowledgeable experts who have an understanding of legislation and can advise how this may technically work.

In the 9 months to April 2020, Australia has experience two unprecedented natural disasters, being the bushfires of 2019-2020 starting in Queensland and moving through the other States and Territories and the current COVID-19 pandemic. This is in addition to the ongoing drought over a number of years.

Both disasters have brought a different response from the Commonwealth and level of acceptance from the Community.

The bushfires were poorly handled by some states with the Commonwealth having their hands tied due to legislation. The response and coordination could have been handled far better if the Commonwealth was able to act sooner.

Australia has seen the opposite with COVID-19, with the Commonwealth taking the lead on a national approach to coordination. A part of the Commonwealth's ability to do so was a result of the States and Territories acknowledging early on they would require the Commonwealth's support in managing the



pandemic and providing valuable resources and money. As previously stated, this has worked only because the States and Territories could see the need for help. As soon as the crisis starts to recede the agenda of each State and Territory starts to reassert. It is only through legislation can this self-interest be stopped.

**9. With respect to policy, legislative, administrative or structural reforms, our belief is:**

A review of the past 40 years of legislation and zoning changes across the country reflecting land management practices, wildlife and environmental protection changes, shows a lack of understanding of the consequences these changes have had. A common sense approach is required to remove the self-interest of key groups who have the opportunity to hold the power in decision making and the reduction in resources required for responsible management of land and forestation assets.

As part of a new national framework, structural reforms are required. Whether this incorporates a new Land Management Authority, National Forestry Commission or National Fire Management Committee (or a combination of all) is open for discussion. What is required is a review of key legislation and zoning changes made in the past 40 years and the impacts these policy changes have had on the management of land, environmental and wildlife protection. We acknowledge not all legislation is bad.

Environmental land management legislation changes across Australia have been significant in the past 40 years, however the land management practices required to respond to these changes have not adjusted to deal with these changes with land management resources being reduced rather than expanded. There is minimal acknowledgement of the impact these legislative changes have had to land management itself and the fuel loads produced by national parks, crown land and forests which have been locked up. Forestation produces litter. This is a natural occurrence. There is no way to stop forests producing litter. If land management practices and legislations have changed in the past 40 years, lessening the reduction and removal of litter through control burns or the public removing timber, it is natural that fuel loads will continue to grow to such a state that when an event occurs the consequences are potentially catastrophic. Climate variability will only enhance this problem.

There are opportunities for improvement with up to 40 years of evidence available to show the impacts legislation changes have had, what aspects have worked and those which have failed. A review of this should be undertaken outside of government with a range of independent experts having legal, environmental, economic, health, land management and scientific experience. The consequences of bad legislation and reductions in budgets for land management practices have been devastating for the land and wildlife.

A common theme comes through when reviewing published information and comments from people who have lived and worked in rural Australia over the past 40 years. The most successful period of land management practices of crown land, national parks and forests was when States and Territories had a Forestry Commission responsible for the management and protection of these resources.

A way forward. Identify all legislation changes in the past 40 years by State and Territory. Map the growth of forestation by region. Map the changes in (and current) resources available over the past 40 years to manage land assets (crown, national parks, forests, etc). Identify known and suspected contributing factors to why bushfires have increased in size and intensity. Australia has expert scientists, empirical and anecdotal data, indigenous and non-indigenous professional land management experts who can provide factual information from past experiences. It is the challenge of the Commissioners to hear from these individuals without the hysteria which comes from the extremes on both sides of the conversation. Australia does not have a good history of listening to those on the ground and implementing the recommendations from previous enquiries. This leads to a lack of faith from experts to provide their opinions and knowledge. This challenge will need to be addressed by the Royal Commission.

**10. Ways in which Australia could achieve greater national coordination and accountability, through common national standards, rule-making, reporting and data-sharing with respect to key preparedness and resilience responsibilities, including for:**

As previously stated, a place exists for a national framework which establishes and manages a national set of standards, land management reporting requirements and the sharing of resources and information/data across all states and territories. The introduction of a monthly online reporting framework on national hazard reduction measures would provide the public transparency and hold government or the entity's responsible accountable to a national framework. Government currently write and introduce legislation; however, they have not been held to account for failures in this legislation, its interpretation, implementation and management.

Land and wildlife management practices, hazard reduction measures and restoration, species conservation, weed eradication and habitat protection is all interconnected. Current legislation and management frameworks are not structured or set up to consider the interconnectedness of dealing with multiple government departments responsible for individual elements. Past inquiry submissions show confusion exists between the management of some local government authority rules verses state based legislation and the interpretation of the differences and how to proceed. This leads to delays and lack of mitigation opportunities.

A national body such as Land Management Authority or National Forestry Commission represented by experts across a range of fields would provide an opportunity for improvement to the current conflicts in legislation and land management practices and inconsistencies between states and territories. Fire management practices vary across the country. Evidence provided to previous inquiries show that some existing fire management practices in certain regions fail to meet standard bushfire risk management plans. All bushfire management plans and practices should be audited on a regular basis under a national framework.

We should look at the reintroduction of providing permits allowing the removal of fallen timber and the select removal of certain species from national parks, crown land and forests. This would decrease the volume of fuel that requires burning in designated regions, providing longer periods between prescribed burn offs. This arrangement could be managed based on a classification system of timbers in select regions and permits being issued to responsible individuals or organisations.

Reducing access to crown land, national parks and forests over the past 15 years have led to fire trails and tracks falling into disrepair. The recent bushfires highlight initial and immediate accessibility issues, where heavy equipment was required to be brought in to provide access routes into fire zones. Fire trails and access points should never reach dead ends as this leads to death when fire fighters are trapped during defensive positions. Fire trails and access roads should have complete interconnectiveness allowing for alternative retreat and defence positions.

To effectively develop national standards there is a need to clearly understand the size of our forestation areas and the fuel loads developed in a given year. This requires mapping of all regions for species of trees and vegetation, age of the forestation and spatial mapping for density. A set of base rules are then defined for average conditions to identify the annual volume of fuel load produced for each region. Using available scientific tools, climate condition mapping and long term forecasts which can predict warmer, cooler, wetter and drier conditions, mapping can be updated to reflect changes in fuel load production and whether it is dead or living. This would also provide information for higher risk areas or changes to risk areas allowing for responsible adjustments to land management practices with current information. Designing a prescribed burn policy, including a dedicated program of properly equipped, trained and experience personal who have the support of sound science behind them will provide a significant opportunity for improvement to the current processes. Harnessing the knowledge of the CSIRO, BOM, the Bushfire and Natural Hazards CRC and Universities is a high priority.

Along with detailed fuel load information over laid with the geographic region, its accessibility and topography, agreed fire response rules can be developed. A standard set of response rules can be developed to provide a guide for each region, based on the size of the fire and head front behaviour, the fires intensity expressed in kilowatts per meter and weather conditions at the time. Real time information from a fire response team should be able to be relayed back into a standardised online system with

simulation and scenario modelling capabilities that take into account changing conditions, information obtained at the fire front, which then alerts responders if there is the requirement for additional support or changes in the type of support or equipment required.

With respect to residential areas there should be standardised bushfire management policies for all local government authorities, giving land owners clear knowledge and understanding as to what preventive and mitigation strategies they can undertake on and around their homes, including the size of fire breaks. There needs to be a reduction in the approval process to undertake fire control burning and permits or plant reduction activities for individual land owners.

**11. Ways in which the traditional land and fire management practices of Indigenous Australians could improve Australia's resilience to natural disasters.**

It is well documented, with empirical and anecdotal evidence and research showing the approach of indigenous Australians to land and fire management practices is one of the least evasive to the environment, plant species regeneration, weed control and wildlife protection. Indigenous Australians did not have a calendar of days and a checklist of conditions which first had to be met before burning occurred. The Indigenous cold burning methodology (opposed to hot burning which traditional happens in a bushfire) provides a number of benefits including:

- a) Fire load reduction of forest litter.
- b) Ability of the soil to maintain its structure which allows native grass and plant structures to rejuvenate where as hot burning destroys soil structures allowing weeds and non-native plant species to grow.

The forestry departments and commissions which previously existed in each state and territory followed many of the practices developed by Indigenous Australians over the centuries. No State or Territory government is providing answers as to why these practices changed and what increased benefits have resulted from their changes. It is usually those on the ground actually doing the work that have a far greater understanding and knowledge as to what is required rather than bureaucrats or university students with a theoretical knowledge but no practical expertise which comes from years in the field.

Yours faithfully



Edward Andrews  
Managing Director













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Dear Sir or Madam

Thank you for your time earlier today on the telephone.

As discussed, on behalf of IPSGroup Pty Ltd, please find attached the Company's Submission for the Royal Commission into National Natural Disaster Arrangements.

Pages 12-16 of the document have been labelled Private and Confidential – not for public release.

The Company is happy for pages 1-11 of the submission to be published under the Company's name.

Thank you very much for your assistance.

Yours faithfully

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5 June 2020

The Royal Commission into National Natural Disaster Arrangements  
Locked Bag 2000  
Manuka ACT 2603

Dear Commissioners

As recently discussed at and provided in evidence to the Royal Commission into National Natural Disaster Arrangements, there are significant inconsistencies between the operating procedures and standards between the states and territories. What was not discussed is the differences which exist in training standards and expectations of International 1<sup>st</sup> responders and the equipment they are provided when coming to Australia to provide assistance.

These differences are identified and cause problems when international responders are inducted into Australia's state and territory response units. In many situations, equipment provided by the International responders do not meet the state and territory standards. This slows the speed to which responders are able to be inducted and deployed while equipment and uniforms can be sourced.

For some time, IPSGroup have been working with Federal Agencies in the United States to gain a clear understanding on the differences in training requirements and response protocols used by the two countries. This has been important when seeking to provide surge capacity resources under contract.

A similar situation exists in the United Kingdom, where their 1<sup>st</sup> responders were limited in the support activities they were able to provide when they deployed to Australia during bushfires of 2019-2020. We believe a full review should be undertaken on how International 1<sup>st</sup> responder resources can be better utilised. In addition, if Australia sources international support, why do the states and territories not look to commercial operators in providing surge capacity support to their respective states and territories? It appears the state and territories, in not only not understanding and be able to identify best practices are deliberately protecting their own opportunities to the detriment of the communities in which they are supposed to support.

Yours faithfully



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