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Tasmania Fire and Emergency Service Bill
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Draft Tasmania Fire and Emergency Service Bill & funding options paper

Thank you for the opportunity to provide comment on the Draft Tasmania Fire and Emergency Service Bill & funding options paper. Private Forests Tasmania (PFT) has previously made submissions to the ongoing fire and emergency service reforms.

Private Forests Tasmania (PFT) is an independent statutory authority established under the Tasmanian *Private Forests Act 1994*. We work to facilitate and expand the sustainable growth and development of the private forest resource in Tasmania. We do this through providing information to private forest growers, through research collaborations, advocacy, innovation and planning tools. Under our [Corporate Plan 2023-26](#) one of our four goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

PFT acknowledges the changing nature of fire and emergency management in the face of climate change and the need to update and improve fire and emergency management arrangements. We congratulate the Government on initiating the review and provide the following comments on the draft Bill and funding options paper.

More emphasis needed on fire prevention and preparedness

There are four elements to contemporary fire management - prevention, preparedness, response and recovery. PFT believe there could be more emphasis in the Bill placed on the first two of these, prevention and preparedness. For example, the objectives of the new TFES are described in clause 9 of the draft Bill and they are framed in terms of responding to emergency events. Activities that lead to bushfire prevention (risk mitigation) and better preparedness are essential to improve the management of fire in the landscape and address the increased risk of more frequent and severe bushfires. Prevention and preparedness should be stated as clear objectives of the new TFES and be explicitly included amongst the functions (clause 10) of the new entity. Furthermore land owners could be incentivised for good land management as part of the preparedness, for example, via levy rebates.

State Fire Management Council & Fire Management Area Committees

The current *Fire Service Act 1979* established the SFMC and the FMACs. There are no corresponding provisions in the draft Bill for these important fire management bodies and it is unclear whether they will continue under the new arrangements given the automatic repeal of the old Act.

The current SFMC formally includes nominees from all the major land managers in the State (public and private) and is therefore in a unique position to be able to provide expertise and advice to the Minister on matters relating to landscape scale bushfire. Private forest owners, who collectively manage over 1.1 million hectares of Tasmanian forest, are represented on the SFMC through nominations by the Tasmanian Farmers and Graziers Association and the Tasmanian Forest Products Association. The SFMC has been responsible for a whole range of important initiatives such as the Red Hot Tips program and it has a key role to play in the tenure-blind whole of State Fuel Reduction Burn Program, where high risk locations are identified for fuel reduction by each of Tasmania's 10 FMAC's, working under the SFMC.

The draft Bill only establishes a new State Fire and Emergency Service Committee and gives the new TFES Commissioner the power to establish other committees as he or she sees fit. However, the Bill does not prescribe any roles, functions or powers, or membership of these committees and therefore the Tasmanian public cannot have confidence that the important bushfire prevention and preparedness activities currently undertaken by the SFMC and the FMACs will be given the status and funding they need and deserve.

Industry brigades

Tasmania has a number of private forest management companies (eg. Forico, Reliance Forest Fibre, SFM) who, as responsible forest and land managers, have invested a significant amount in establishing their own bushfire resources and capabilities. This includes trained personnel, equipment, tankers, state of the art fire detection systems and industry agreed bushfire prevention protocols and procedures. These resources are used to manage fire within their own forest estates but are also made available through an industry MoU with the TFS to assist the TFS in broader campaign style fires.

The new Bill contains provisions (clause 83(2)) that will enable the Commissioner to recognise persons from outside the TFES so they have the same legal immunities and protections from liabilities that TFES officers have when engaged in those campaign bushfire operations. This is an improvement on the current situation and is commended. However, consideration should also be given to extending this recognition of 'industry brigades' in the Bill so it covers additional aspects such as training, equipment sharing, protocols and procedures and communications, for example including industry brigades in the TasGRN network. A fully coordinated response to the increasing threat of landscape scale fire using all available resources (public and private) will be in the best interest of all Tasmanians.

TFES - property levy

Part 4 of the draft Bill contains the provisions regarding TFES funding and the Options paper provides additional background and explanatory information, particularly regarding the two options (option 1 & option 2) for the TFES property levy. PFT has received strong representations from our private forest stakeholders that both options would result in very significant increases for the property levy component (upwards of 400% increase).

Since publication of the draft Bill and the Options paper, the Minister, on 11 November 2023, announced that the Government had heard the concerns regarding the proposed levy options and will now establish a working group to develop a new model that Tasmanians support. PFT commends the Government and the Minister for listening to landowner concerns and we strongly suggest the new working group has private forest representation. We look forward to further consultation and involvement in developing a new model.

The characteristics of any new model should explicitly deliver the following outcomes;

1. Recognise the variable risks factors that are associated with fire management.
2. Clearly recognise the commercial value of private enterprise investment in fire management, resources and equipment and include mechanisms to reward landowners who take on this responsibility.
3. Ensure that the different service levels provided are reflected in variable levy levels above an agreed base contribution from all landowners ie. professional vs volunteer brigades.
4. That the amount levied on landowners be reflective of a hierarchy of response. Most of the funding comes from large forest landowners yet they are last on the hierarchy as priority for response.
5. Transparently account for those land managers who have in place detailed fire management and fire protection plans and assets.

Any new model that is developed must recognise the significant investment that forest management companies and individual farmers have already made to bushfire management. I have already provided some information in the preceding paragraphs on the investment by private forest management companies in industry brigades and the contributions they are already making to the cause. Individual private forest and rural property owners are also contributing. Many will be members of their local volunteer fire brigade and may spend a significant amount of their own time maintaining their skills and responding to emergency management events. They may also be doing a substantial amount of bushfire risk mitigation on their own and neighbouring properties, all at their own cost.

The design of a new model should at the very least recognise these contributions and should incentivise private forest and rural property owners to make further investments in the prevention, preparedness, response and recovery from bushfire threats.

If you have any queries on the points we have raised, please contact me on [REDACTED] or our Policy & Data Officer Murray Root on [REDACTED].

Yours sincerely,



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