

Our Ref: GS.STA 5.01 3 March 2017

Economic Regulation Authority PO Box 8469 PERTH BC WA 6849

Dear Sir/Madam

SUBMISSION - REVIEW OF THE EMERGENCY SERVICES LEVY

Thank you for the opportunity to lodge a submission in relation to the review of the Emergency Services Levy as described in the document entitled, *Review of the Emergency Services Levy, Issues Paper*, 30 January 2017 (the Issues Paper).

Shire of Mundaring has a significant interest in this matter given it's role in collection of the ESL and as a recipient of ESL monies via the LGGS as distributed by DFES toward the costs associated with the running of 9 Volunteer Bush Fire Brigades and 1 State Emergency Service unit.

In general the ESL is currently considered to:

- Be inequitably distributed across the emergency services sector, particularly local governments, noting that local governments are in a number of rural and rural urban interface areas responsible for the provision of some emergency services.
- Not accord with a need to minimise the total cost of emergencies to communities/the state by not being accessible for funding activities across Prevention, Preparedness, Response and Recovery.

The remainder of this submission is basically set out to cover, and in the order of, the matters raised within the *Questions for interested parties* on page v of the Issues Paper, as follows:

1. Funding should be allocated to provide for Prevention, Preparedness, Response and Recovery (PPRR) activities with a view to the minimisation of the cost of emergencies to the community and state.

The Shire of Mundaring currently applies funding from all sources of revenue to the full spectrum of PPRR however is only able to apply ESL funding to Preparedness and Response activities.

Funding for Recovery would ideally provide for the development of recovery arrangements and capability and a reserve fund that local governments could access if required following a significant incident.

- 2. Primarily the ERA should in setting the ESL consider how best to equitably distribute the cost burden to the community relative to Emergency Management risk and experience rather than just the provision of Emergency Services, that is emergency responders.
- 3. The current grants sourced from the ESL to local governments under the Local Government Grants Scheme as distributed by DFES are overly restrictive in application and do not properly fund the legitimate costs of Volunteer Bush Fire Brigades. The ESL funds are thus unfairly and inequitably distributed.

4. The ESL should cover:

- 4.1 Local Government share of Community Emergency Services Manager (CESM) Costs. Shire of Mundaring currently funds 50% of such costs through municipal funds with DFES providing the other 50%.
- 4.2 Bush Fire Risk Management Plan development costs
- 4.3 Preparedness/community engagement costs
- 4.4 Bush fire mitigation costs
- 4.5 Costs associated with Local Emergency Management Arrangement development costs and associated community emergency risk assessment processes.
- 4.6 More of the costs associated with volunteer bush fire brigades such as pre engagement medical assessments, police checks.
- 4.7 Recovery costs (see 1. Also)
- 5. Future changes to expenditures on emergency services are likely to
 - 5.1 Be partly dependent on the ultimate on decisions relating to the establishment of a Rural Fire Service
 - 5.2 Be required to be responsive to the effects of changing weather patterns across the state with particular regard to extreme weather events and bushfires.
 - 5.3 Be required to manage increasing community expectations in relation to emergency management
 - 5.4 Need to cater for development patterns across the state.
- 6. The ESL should be distributed according to a transparent and responsive methodology
- 7. The ESL should be subject to a comprehensive acquittal procedure, be subject to an appropriate audit regime and public reporting including the amount collected and details as to the recipients of disbursements and the respective amounts concerned.
- 8. The ESL should be distributed by an agency that is not directly or partly funded by ESL funds.
- 9. A rural fire service could be partly funded by the ESL.

10. The cost of a rural fire service is largely dependent on the structure of such a service. It is reasonable to conclude that such a service could to a degree as yet unknown consist of emergency service resources already in place in the areas concerned.

Shire of Mundaring considers a review of the ESL to be both timely and necessary. Should you require any further information on this submission please do not hesitate to contact the undersigned.

Yours sincerely

Advis Program

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