



Association of Volunteer Bush Fire Brigades WA inc

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Response to recommendations of the ERA's draft report of its 2017 Emergency Services Levy Review

15 August 2017

The Association of Volunteer Bush Fire Brigades (AVBFB) hereby submits the following formal response to the recommendations contained within the draft report of the ERA's 2017 Emergency Services Levy Review.

Summary of key principles/assumptions underpinning our detailed response

- The AVBFB believes in whole-of-community solutions to whole-of-community challenges. This translates to support for a tool such as the Emergency Services Levy (ESL) to help fund the essential costs of providing effective and efficient emergency services to the whole of Western Australia.
- The ESL in its current form is a relatively effective tool and is therefore, supported in principle.
- Several specific elements of the current ESL system are problematic and contribute to inefficiency.
- The responsibility for the collection, management and allocation of ESL funding must not reside with an agency that is, or is seen to be a beneficiary of the approval or denial of any funding application.
- Locally coordinated preparedness and prevention (mitigation) activities within communities are highly efficient mechanisms to reduce risk of bushfires and other hazards.
- Applications for ESL funding should be open to all agencies, organisations, community groups and individuals for any activity intended to reduce risk and/or impact of bushfire and other hazards on local communities.
- ESL funding should be determined on a case-by-case basis and all deliberations and decisions (whether approved or not) should be made publicly available immediately after the determination is made.
- The only criteria for ESL funding approval should be that activities will return positive impacts on reducing risk for high risk communities at the lowest price and no higher priority for that funding currently exists.
- ESL funding should be available for activities that fall within any of the four aspects of emergency services: Prevention, Preparedness, Response and Recovery (PPRR).
- Where local volunteers are willing and able to undertake activities funded by ESL, they should have priority.
- There is strong community expectation that hypothecated taxes such as the ESL be used exclusively for front-line services. Administrative costs of all government departments should therefore be subject to the scrutiny of the Budget process including EERC hearings, Estimates and government-wide "efficiency" cuts.
- The decision of the previous government to provide the entire ESL and control of its allocation to DFES has resulted in significant inefficiencies and the damaging perception, if not reality, that administrative and other non-essential activities have been prioritised over the delivery of front-line services.
- Regardless of the criteria used to determine ESL funding, they must be consistent and applied equally and transparently to all recipients.
- With particular focus on:
 - the need to promote competitive and fair market conduct,
 - the need to promote regulatory outcomes that are in the public interest, and
 - the need to promote transparent decision-making processes that involve public consultation

the AVBFB believes there is a need for government to call upon the ERA to undertake an urgent inquiry into the potential structure, cost and benefit of an independent Rural Fire Service, including a comparison to the efficiency and value for money being delivered by the current structure.



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AVBFB response to specific recommendations

Draft Report Recommendation 1

Basic Structure of the ESL system should be retained.

AVBFB response

SUPPORTED subject to certain conditions

Broadly, the AVBFB supports the retention of the basic structure of the ESL.

However, several significant changes must be made to ensure it continues to have the support of rate payers, local governments and the volunteer bush fire service:

- The management of the ESL must be moved from DFES to a body that is not a recipient of ESL funding or is seen to potentially “benefit” from approving or denying any particular grant application.
- The criteria used to qualify applications for funding must be as broad as possible (or possibly even abolished) to encourage innovation and efficiency in the delivery of locally-appropriate projects that improve emergency services.
- The decision matrix used by the decision-making body should prioritise innovative, local solutions with high return-on-investment ratios.
- The process used by the decision-making body to determine ESL funding must be applied consistently and transparently to all applications.
- A summary of the decision of each successful and unsuccessful funding application must be published by the deciding body immediately after each decision is made.

Draft Report Recommendation 2

Gross rental value should be retained as the basis for calculating ESL rates.

AVBFB response

AMBIVALENT

The AVBFB does not have the resources required to undertake the research required to provide a clear position in regard to this recommendation. We note that there has been significant conflicting commentary that the UV value system should be explored further and therefore suggest the work be undertaken by an appropriate agency as soon as possible in order to provide certainty and stability to land-owners and local government.



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Draft Report Recommendation 3

The agency that advises the Minister for Emergency Services on ESL revenue and rates should not benefit from the ESL.

AVBFB response

SUPPORTED

It is essential that the agency tasked with the management of the ESL (including its collection and distribution) must not also be, or be perceived to be, a beneficiary of the funding.

This is not only a basic anti-corruption mechanism, but critical to rebuilding the credibility (and therefore public support) of the ESL as a viable and valuable mechanism to contribute to the funding of Western Australia's emergency services.

Draft Report Recommendation 4

The Office of Emergency Management should be given the oversight functions for advising the Minister for Emergency Services on the amount of ESL revenue required, and the ESL rates.

AVBFB response

SUPPORTED with qualifications

The AVBFB supports the Office of Emergency Management (OEM) assuming the role of advisory to the Minister for the ESL, subject to management of the ESL being completely independent of DFES and the OEM being funded from consolidated revenue. Some may see it as a relatively minor nuance, but the use of the word "oversight" in the ERA's draft recommendation infers (or may allow) continued DFES involvement in the management of the ESL which as explained above, the AVBFB believes is not in anyone's interest as it poses a perceived and potential real conflict of interest.

Draft Report Recommendation 5

The Office of Emergency Management should be made independent of the Department of Fire and Emergency Services. It should report directly to the Minister for Emergency Services rather than the Fire and Emergency Services Commissioner.

AVBFB response

SUPPORTED with qualifications

The AVBFB supports the recommendation to make the OEM independent of DFES.

However, the recommendation must be altered to specific that the OEM will be independent not only in regard to reporting lines, but also ensure the OEM has its own independent budget drawn from consolidated revenue to eliminate any potential or perceived dependence.



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Draft Report Recommendation 6

The Office of Emergency Management should oversee how the Department of Fire and Emergency Services (and a rural fire service if established):

- a) Allocates ESL funds to stakeholders; and
- b) Spends its share of the ESL funds

AVBFB response

NOT SUPPORTED in current form

The AVBFB does not support the recommendation as it is currently written.

It is the considered view of the AVBFB that a truly independent OEM should assume oversight of the Department of Fire and Emergency Services (DFES) and the new independent Rural Fire Service, but cannot support the inference contained in sub-part “a)” that those agencies would retain the role of allocating ESL funding.

The AVBFB has advocated for many years that the ESL should not be administered by the agency that is also a beneficiary of that funding and continues to strongly recommend that change in the interests of preserving the credibility (and therefore public tolerance) of the ESL as a viable and valuable mechanism to fund Western Australia’s emergency services.

The AVBFB supports the principle of sub-part “b)” in that there must be an agency tasked with ensuring ESL funding is acquitted according to the terms in which it was allocated, but this role should extend to overseeing the acquittal of all ESL funding, not just that allocated to DFES and the inevitable RFS.

To be clear, the AVBFB supports the OEM taking an oversight and management role of those services currently managed by DFES and the new independent Rural Fire Service, but cannot support any recommendation for structural change that includes a beneficiary of the ESL also having a decision-making role with regard to its allocation.

Draft Report Recommendation 7

The Office of Emergency Management should be the body of appeal for ESL related issues, and the Fire and Emergency Services Commissioner’s appeal role should be revoked.

AVBFB response

SUPPORTED with qualifications

The AVBFB supports this recommendation with the following caveats:

- the OEM must first be made truly independent of DFES
- if the OEM was to assume the management of the ESL (which the AVBFB does not oppose), the body of appeal for ESL related issues would need to be an independent agency such as the State Administrative Tribunal (SAT).



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Draft Report Recommendation 8

The Department of Treasury should undertake a review of the Department of Fire and Emergency Services' structure, resources and administration costs to determine whether services are efficiently delivered.

AVBFB response

SUPPORTED with further recommendations

The AVBFB supports this recommendation and suggests that if such a review is to occur, the scope should enable an assessment of the efficiency and cost/benefit of functions (including roles of personnel) that were previously undertaken by other agencies and volunteers but are now managed by DFES.

Draft Report Recommendation 9

The ESL should be used to fund prevention undertaken by the Department of Fire and Emergency Services, bush fire brigades and State Emergency Service units that have community-wide benefits or which involve coordination of prevention across land tenures.

AVBFB response

SUPPORTED with qualifications

While possibly slightly tangential to the recommendation at hand, the AVBFB believes it is essential to highlight the difficulty it, and other stakeholders have with the inconsistent representation of whether DFES undertakes – or indeed should undertake - any prevention activities at all. We understand this issue may fall outside the scope of this review, but the premise of the question assumes DFES undertaking prevention activities when it has been publicly stated on many occasions that it is a response-only agency. It is therefore challenging in the least to provide a coherent response to the recommendation while there is dissonance between its premise and the reality.

Nevertheless, we offer the following in good faith.

The AVBFB is of the very strong view that a fundamental flaw in the philosophy of the current bureaucracy is that the relatively minor efficiency gains achieved through “standardisation” and heavily prescriptive rules outweigh the value of fit-for-purpose solutions.

The diversity of Western Australia’s environment and urban morphology necessarily demands a flexible approach to essential and emergency services – in contrast to the stated goals of the current Department.

It is this understanding that underpins the AVBFB’s position on this recommendation.

The AVBFB offers qualified support for the recommendation in that the criteria for ESL funding should be broadened – preferably to also include prevention, preparedness, mitigation, prescribed burning, response and recovery activities.

However, the AVBFB argues that it should not be limited to only the services mentioned. In order to better encourage innovation and efficiency, it is strongly advocated that ESL funding should not be limited to any specific agencies and/or particular services. Rather, decisions for ESL funding should be based on projected return on investment and local value of each specific application, irrespective of who the applicant is.



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Draft Report Recommendation 10

The ESL should be used to fund the preparedness activities of the Department of Fire and Emergency Services, the bush fire brigades and State Emergency Service units that have community-wide benefits.

AVBFB response

SUPPORTED with qualifications

As explained above, the AVBFB believes the fundamental question of whether DFES does and/or should undertake preparedness activities must first be addressed and a distinct opportunity to do so exists at the time of implementing the new independent Rural Fire Service.

Regardless of the role of each government agency, the AVBFB strongly supports the ESL being explicitly made available for preparedness activities subject to it being made available to any organisation (including Local Government) for any activity or project deemed worthy and valuable for that community at that time.

Draft Report Recommendation 11

The ESL should be used to fund the response activities of the Department of Fire and Emergency Services, the bush fire brigades and State Emergency Service units.

AVBFB response

SUPPORTED with qualifications

The AVBFB supports the ESL being made available for response activities.

However, as explained above, the AVBFB's preferred position is that funding applications should be determined based on the return to the community rather than arbitrarily limiting those who may apply and/or for what types of work. Therefore, support is offered for the removal of the three entities named in this recommendation.

Draft Report Recommendation 12

The ESL should not be used to fund the costs of recovery.

AVBFB response

NOT SUPPORTED

The AVBFB does not support this recommendation.

Recovery is a seriously neglected phase of almost every emergency that occurs in Western Australia primarily due to the lack of funding available.

Poorly managed recovery operations can devastate the physical and emotional health of communities which in turn erodes resilience and local capacity to manage future challenges. Ultimately, the economic and social viability of communities that are not well supported post-emergency will be reduced and create greater risk and liability for the State going forward.



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The ESL – Emergency Service Levy – should be available to fund all aspects of Emergency Services and while it is not well acknowledged by some, organisations such as the Volunteer Bush Fire Service already provide extremely important recovery activities as part of the emergency services it provides.

This under-acknowledged service helps damaged communities recover and often, recover in a way that makes them more resilient with greater local capacity for the future.

Draft Report Recommendation 13

The ESL should be used to fund the administration costs of the Department Fire and Emergency Services.

AVBFB response

NOT SUPPORTED

The AVBFB does not support this recommendation.

Community expectation is that the ESL exists to provide front-line services and the necessary administrative costs will be derived from consolidated revenue. This change would align with the structure of most other government services and also encourage greater scrutiny of the administrative costs of DFES (via the annual budget process) which would likely result in better efficiency in the Department. By way of example, the administration costs of the Department of Water are not funded directly from water rates and usage income.

The current inequity in the decision to fund DFES but not Local Government for the administrative costs of managing emergency services is also unjust and causes damaging morale issues within and between services. The AVBFB strongly argues that if DFES administration continues to be funded from the ESL, Local Government (and therefore DPaW and others) should receive a proportional amount.

However, in the strongest possible terms, the AVBFB is of the view that a far more practical, equitable and sustainable solution is for no agency to receive ESL funding for its administration as this practice for DFES alone significantly reduces the availability of ESL for exceedingly important front-line services already not funded by the ESL, such as mitigation.

Draft Report Recommendation 14

The ESL should be used to fund the full costs of the Community Emergency Services Managers in local government. However, it should not be used to fund the broader emergency service and management responsibilities of local government or the administration costs linked to bush fire brigades and State Emergency Service units.

AVBFB response

SUPPORTED with qualifications

The AVBFB supports the ESL being made available for all expenditure related to the provision of Western Australia's front-line emergency services – including the employment of emergency officers by Local Government.



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However, as previously stated the AVBFB's preferred position is that funding applications should be considered on a case-by-case basis and judged on the return to the community rather than arbitrarily limiting those who may apply and/or for what types of activities.

Notwithstanding the above, the AVBFB notes that the current situation of DFES accessing ESL funding to pay for staff embedded in Local Governments that are unable to access ESL to independently fund an identical position is yet another example of deeply problematic inconsistencies and perceived conflicts of interest in the way the ESL is managed. We therefore humbly warn that any specific reference to, or support for, ESL for being made available for the current program of funding DFES employed Community Emergency Services Managers may be treacherous.

Draft Report Recommendation 15

The Office of Emergency Management should compensate local government for the cost of collecting ESL revenue (including the costs of recovering unpaid debts and any ESL revenue that cannot be recovered).

AVBFB response

SUPPORTED

Feedback provided to the AVBFB from Local Government suggests that partly because of the administrative costs involved and partly because of the damaging perception that the ESL is a Local Government Tax, many would prefer to not collect it on behalf of the State Government, particularly when it has little or no control over how the funding is redistributed.

The AVBFB does however recognise that there are efficiency gains to be had by including the ESL on rates notices and this in turn, minimises the overall burden to the taxpayer.

With that in mind, if Local Government is to continue to collect ESL revenue on behalf of the State, the AVBFB strongly supports this recommendation.

Draft Report Recommendation 16

If a rural fire service is established, the ESL should be used to fund the efficient costs of:

- a. response activities;
- b. prevention and preparedness activities that have community wide benefits; and
- c. the administration costs of the rural fire service. (Chapter 7)

AVBFB response

SUPPORTED with suggested edits

The AVBFB supports this recommendation with the qualification that our preferred position is that administrative costs (c) for all government agencies (including DFES) should ideally be funded from consolidated revenue and hypothecated taxes such as ESL should be dedicated to providing services rather than administrative functions.



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Draft Report Recommendation 17

New emergency services legislation should clarify the extent to which the Department of Fire and Emergency Services and local governments are obliged to undertake prevention activities, and whether these activities may be funded from the ESL.

Page 56 of the ERA report offers that ‘new emergency services legislation could address barriers to expenditure on prevention, by clarifying the responsibilities of DFES and Local Government’.

AVBFB response

NOT SUPPORTED

While we acknowledge the promise to clarify the responsibility for prevention was made in the “Concept paper” published by DFES in 2014 (and reiterated on page 56 of the ERA’s draft report), the AVBFB has extremely strong concerns about many other changes that document championed (please find the AVBFB’s response to the DFES Concept Paper here <http://avbfb.org.au/dfes-concept-paper-2014/> for your perusal).

Despite investing scarce resources into cooperatively participating in the multi-year “Review of Emergency Services Legislation” which culminated in the “Concept paper”, the AVBFB has not been afforded visibility on any draft Bill or proposed changes to existing Legislation.

We are therefore somewhat fearful that promises to address relatively minor issues with “new emergency services legislation” might be the thin edge of the wedge and be strategically used to open the door for a raft of much more problematic changes in line with the views expressed by DFES in its “Concept Paper” three years ago.

To be very clear, the AVBFB has strong concerns about the potential of legislative changes intended to achieve this outcome becoming an overly prescriptive, unworkable set of rules that ultimately do not provide a good return on investment for the community. In the absence of a very transparent and thorough consultation period on the detail of any future proposed Bill, support cannot be given for any proposal to make undefined changes in legislation.

Draft Report Recommendation 18

Grouping of properties should be discontinued for the purpose of calculating the ESL.

AVBFB response

SUPPORTED with extra suggestion

The AVBFB supports this recommendation. We acknowledge that we have had varying views in regard to this topic, but believe it is the most responsible way forward.

Comments have been made in relation to which category, GRV or UV when determining the levy – on which the association does not have a preferred option at this point in time.

Changes that may impose additional costs on any landowner should be thoroughly investigated and if so, transitional arrangements must be made to phase in any change.



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Draft Report Recommendation 19

A levy on boat registrations should be introduced to fund the direct costs of the Volunteer Marine Rescue Services.

AVBFB response

NOT SUPPORTED

The AVBFB does not support this recommendation on the basis that it is inconsistent with the approach taken with other areas of funding e.g. car owners do not pay a levy for car crash rescue (Recommendation 20).

As the peak body for tens of thousands of passionate community-minded volunteers, the concepts of fairness, equity and “the greater good” loom large in many of the ideological positions formally adopted by the Board of the AVBFB. Although this recommendation has some face-value appeal, our lack of support for this recommendation is testimony to our commitment to a fair, consistent and whole of community approach to public policy.

Specifically, we argue that support for both recommendations 19 and 20 would mean applying contrary standards to two comparable groups of our community and therefore compromise one’s policy-making credibility. As such, we strongly urge the ERA to re-consider the wisdom of including both recommendations in the final report.

Draft Report Recommendation 20

Road crash rescue services should continue to be funded from the ESL.

AVBFB response

SUPPORTED

The AVBFB supports this recommendation on the premise that it is in the long-term interests of our entire community to do so, noting that providing ESL funding for this activity reduces the amount available for the core functions of the Volunteer Bush Fire Brigades that we represent.

Draft Report Recommendation 21

Landgate should conduct another review of land classifications in the Swan Valley to ensure that vineyards are classified appropriately.

AVBFB response

SUPPORTED

The AVBFB supports this recommendation to the extent that it improves the land classifications and allows the appropriate costs to be applied under the ESL.



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Draft Report Recommendation 22

The Department of Fire and Emergency Services should implement activity based costing to allow for robust analysis.

AVBFB response

SUPPORTED

The AVBFB supports this and any similar recommendation intended to improve the transparency and accountability of the expenditure of public moneys.

Draft Report Recommendation 23

The Department of Fire and Emergency Services should use its cost and incident data to determine the direct costs of providing emergency services to each of the five ESL categories.

AVBFB response

SUPPORTED with extra suggestions

The AVBFB supports the recommendation, and suggests this requirement should apply to all agencies in receipt of ESL funding. We also advocate for an urgent review of the data sharing that does, and should, occur between DFES, DPaW, other State agencies and Local Government in regard to PPRR in the emergency services sector.

Draft Report Recommendation 24

DFES should implement the ISO 31000 standard across its business activities.

AVBFB response

SUPPORTED with extra recommendation

The AVBFB supports this and all recommendation to improve the efficiency, transparency and accountability of internal processes. Further, the AVBFB suggests that the ISO 31000 standard should also apply to the Risk to Resource (R2R) process currently being used to ensure the decision matrix that has been used is based entirely on physical risks without any concern for political risk.

Draft Report Recommendation 25

The Department of Fire and Emergency Services should finalise and implement the Capability Framework.

AVBFB response

SUPPORTED with qualification

The AVBFB supports this recommendation, subject to the task being undertaken by an independent agency to improve the transparency, consultation and accountability.



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Draft Report Recommendation 26

The Department of Fire and Emergency Services should require cost-benefit analysis to be prepared for all major funding allocation decisions.

AVBFB response

SUPPORTED subject to conditions

The AVBFB supports the underlying principle of this recommendation in that where possible, every major funding allocation decision should be thoroughly and transparently evaluated on its merits.

However, it must be noted that the AVBFB can only offer conditional support for this recommendation as it stands because it does not recognise the need for the current, centralised decision-making structure to change.

Draft Report Recommendation 27

The Department of Fire and Emergency Services should require post-project cost-benefit reviews to be presented to senior decision-makers to enable assessment of the effectiveness of past decisions.

AVBFB response

SUPPORTED with extra suggestion

The AVBFB supports this recommendation but encourages the cost-benefit reviews to be made more widely available than only “senior decision-makers” when possible.

Draft Report Recommendation 28

Grants manuals should be made consistent between all volunteer organisations where it makes sense to do so.

AVBFB response

SUPPORTED subject to edit

As explained above, the AVBFB does not support cumbersome, prescriptive grants manuals and favours a more flexible, fit-for-purpose method of determining funding based on a case-by-case analysis.

However, if Grants Manuals are going to continue to exist, the AVBFB reluctantly supports this recommendation subject to the deletion of the word “volunteer” and phrase “where it makes sense to do so”.

It is the view of the AVBFB that consistency should apply irrespective of whether the recipient is a volunteer organisation or another agency or enterprise. Secondly, it is our contention that the inclusion of the phrase “where it makes sense to do so” in a government document provides opportunity for either innocent or mischievous ignorance of the basic intent of the recommendation thus rendering it impotent.



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Draft Report Recommendation 29

The Office of Emergency Management should consult stakeholders when:

- a. determining the ESL revenue to be allocated to stakeholders; and
- b. advising the Minister for Emergency Services on ESL revenue and rates.

AVBFB response

Partially SUPPORTED

The AVBFB supports section (a) of the recommendation on the premise that it is a step toward further improving the transparency and accountability of the process.

The AVBFB does not support section (b) of the recommendation because compelling this activity could act as a disincentive/inhibitor to the Minister being kept informed of matters regarding the ESL.

Draft Report Recommendation 30

The Office of Emergency Management should prepare a report to the Minister for Emergency Services recommending total ESL revenue and rates. The Minister should table the report in Parliament within 28 days of receiving it.

AVBFB response

NOT SUPPORTED with proposed alternative

The AVBFB does not support this recommendation as changes to the value of ESL collected has wide-ranging social and economic ramifications beyond the scope and understanding of the OEM. It is the view of the AVBFB that implementing this recommendation would likely lead to a situation where the government is forced to effectively ignore the advice provided by the OEM. That would eventually damage the credibility the OEM as well as politicise the allocation of the ESL.

The AVBFB would, however, support a proposal to compel the OEM to present such a report to the Minister (only) for his/her internal use. It should be noted that this can already occur within the usual operation of a Ministry and therefore does not require any change.

Draft Report Recommendation 31

The Department of Fire and Emergency Services (and a rural fire service if established) should provide a report to the Office of Emergency Management explaining how it has spent ESL funds and the rationale for this expenditure.

AVBFB response

SUPPORTED subject to extra inclusions

The AVBFB supports the recommendation conditional to the same reporting requirements being imposed on any agency or organisation in receipt of ESL funding.



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Draft Report Recommendation 32

The Office of Emergency Management should prepare and publish an annual report on the ESL.

AVBFB response

SUPPORTED

The AVBFB supports this recommendation in the belief that it may improve the transparency and accountability of the collection and allocation of the ESL.

Draft Report Recommendation 33

The Office of Emergency Management should prepare a brochure on the ESL and provide it to local governments to distribute with rate notices. The brochure should explain the purpose of the ESL and that it is a State Government levy, and describe how ESL revenue is raised and spent.

AVBFB response

SUPPORTED subject to conditions

The AVBFB supports this recommendation conditional to;

1. the preparation and distribution of any promotional material being funded from consolidated revenue and not the ESL; and
2. any such promotional material must be developed with the consultation and consensus of WALGA and the AVBFB

Draft Report Recommendation 34

The Office of Emergency Management should prepare annual estimates of the funding required by the Department of Lands and the Department of Parks and Wildlife to conduct prevention activities on their estates. These estimates should be published in the annual report of each agency, along with the amount of funding provided by the State Government.

AVBFB response

NOT SUPPORTED

While the proposal to prepare and publish estimates of annual prevention activities is to be applauded, the AVBFB does not support using the resources of the OEM to undertake this work.

It is the understanding of the AVBFB that estimates of income and expenditure are required of all government departments and as such, prevention activities should be costed by each agency and included as a line item in their respective section of the State's budget papers.



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Draft Report Recommendation 35

The Department of Fire and Emergency Services should publish data in accordance with the State Government's *Whole of Government Open Data Policy*.

AVBFB response

SUPPORTED

The AVBFB supports this recommendation and believes DFES (and all government agencies) should operate in accordance with all government policy.

Draft Report Recommendation 36

The Office of Bushfire Risk Management should require LG BFBs to publish their bushfire risk management plans and treatment strategies.

AVBFB response

SUPPORTED subject to edits

The AVBFB supports the publication of bushfire risk management plans and treatment strategies. However, the language in this recommendation should be altered to reflect the fact that it is Local Government, not their BFBs that are responsible for bushfire risk management plans.

Also, should this recommendation be enacted, the AVBFB supports funding from consolidated revenue being made available to assist resource Local Government for this work.

Draft Report Recommendation 37

The Department of Fire and Emergency Services should publish a capital grants manual for volunteer organisations it manages (for example the Volunteer Fire and Rescue Service).

AVBFB response

SUPPORTED subject to edits

The AVBFB supports this recommendation subject to the current Local Government Grants system and separate ESL application process for VFBs being consolidated and made consistent with all other services. This will increase efficiency and transparency regarding ESL expenditure.

Further, in the pursuit of a consistent, equitable and accountable process, the AVBFB also suggests that this recommendation should be altered to include the word "all" in relation to DFES-funded volunteer organisations (including Surf Life-Saving and VMRS).

[END]