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Office of **Emergency Management**

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Dear Ms Cusworth

REVIEW OF THE EMERGENCY SERVICES LEVY DRAFT REPORT

Thank you for the opportunity to comment on the *Review of the Emergency Services Levy Draft Report* dated 7 July 2017.

The Draft Report provides a thorough analysis of the Emergency Services Levy, areas of concern and potential reforms.

The Office of Emergency Management has restricted its submission to what we consider are errors of fact in the Draft Report and some clarifications. Our feedback is outlined in the attached table. I hope you find it of assistance.

If you have any queries regarding this submission please contact Ron de Blank, A/Executive Manager Office of the Executive Director, at ron.deblank@oem.wa.gov.au or on 6551 4038.

Yours sincerely

Mal Cronstedt AFSM
EXECUTIVE DIRECTOR
OFFICE OF EMERGENCY MANAGEMENT

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Review of the Emergency Services Levy

Draft Report 7 July 2017

OEM Comments

The following table lists errors of fact identified in the draft report and some clarifications:

Section	Draft Report Reference	OEM Comment
2.2 and General	The report defines “emergency services” as a subset of “emergency management”.	There is potential confusion in the report in the use of these two terms. The <i>Emergency Management Act 2005</i> defines emergency management as “ <i>the management of the adverse effects of an emergency</i> ”. Emergency is defined as “ <i>the occurrence or imminent occurrence of a hazard [one of the 27 legislated hazards] which is of such a nature or magnitude that it requires a significant and coordinated response</i> ”. The majority of emergency service incidents do not require “a significant and coordinated response”.
2.2.1.1	SEMC is responsible for developing a state wide mechanism that ensures a coordinated approach to emergency response and community safety.	Amend sentence to read: “SEMC is responsible for developing a state wide mechanism that ensures a coordinated approach to emergency management. ”
2.2.1.1	The state emergency management framework identifies the relevant authorities or organisations, and outlines the roles and responsibilities to prevent, prepare for, respond to and recover from an emergency or natural disaster event.	Sentence should be amended to finish at “recover from an emergency”. Note: the term “ <i>natural disaster event</i> ” is misleading as the prescribed hazards include man made hazards.
2.2.1.1	The framework also provides procedural	Sentence should be amended to read: “ <i>The framework also</i>

Section	Draft Report Reference	OEM Comment
	guidelines on the reporting structure for emergency coordination across the 27 hazards prescribed under the Emergency Management Act 2005.	<i>provides an emergency coordination structure that is established through the Emergency Management Act 2005 and State Emergency Management Policy."</i>
2.2.1.2	Table 1 summarises the relationship between a hazard, the HMA responsible, and the controlling agency (or agencies) nominated to control the response activities to a particular hazard emergency.	Sentence should be amended to read "...controlling agency (or agencies) <i>who are the agency with responsibility, either through legislation other than the Emergency Management Act, or by agreement between a HMA and one or more agencies, to control the response activities to an incident, as specified in the appropriate Westplan (hazard specific plan)</i> ".
2.2.1.2	Table 1.	Move the footnote 18 reference from 'fire' in the Hazards column to DFES in the Controlling agency column.
2.2.1.2	Some Westplans prescribe hazard risk management strategies.	Replace the word "prescribe" with "outline". Prescribe implies legislative prescription and it is more accurate to say "outline".
2.2.1.4	For instance, SEMC delegates to OEM the responsibility for the development, maintenance, and review of the State Emergency Management Policy (in consultation with relevant stakeholders), the preparation of the Emergency Preparedness Report, and to carry out the State Risk Project.	Amend to: <i>"SEMC delegates to OEM the responsibility for administration of the Emergency Management Act 2005, the development, maintenance, and review of the State Emergency Management Policy, plan, procedures and guidelines (in consultation....."</i> Further, since it was established on 1 December 2016, OEM has taken on recovery and assurance roles.
2.2.1.4	DFES provides OEM with support services in human resources, finance, and information technology.	Note that this is provided through a service agreement.

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2.2.1.6	The Department of Lands liaises with SEMC, DFES and DPAW to implement a BRMP on Western Australia's Crown land.	SEMC should be removed from this list as the Department of Lands does not liaise with SEMC.
2.2.1.7		DPaW are also a prescribed combat agency for fire suppression, similar to the comment made about LG in 2.2.1.8.
2.2.1.8	Local government Chief Bush Fire Control Officers are responsible for coordinating volunteer brigades, including brigades that are administered by DFES.	Volunteer brigades are administered by the relevant local government or DFES, depending upon their legislative basis.
2.2.1.8	Local governments are also the prescribed combat agency for fire suppression under the Emergency Management Act 2005 and Emergency Management Regulations.	Although this statement is made, there is no further explanation in relation to the definition of a combat agency or their responsibilities. There is no examination of, or similar considerations to fund, other combat agencies such as the Department of Biodiversity, Conservation and Attractions.
2.2.1.9	Figure 2.	The OEM should be reflected as a unit within DFES (as is OBRM). The OEM is only a sub-department of DFES under the <i>Financial Management Act</i> , not for corporate administration. This could be reflected as a footnote to the figure.
3.2	Most government services are funded through general government revenue. However, emergency management in Western Australia (and some other Australian states) is funded through a property-based special purpose levy.	Emergency management is not funded through the ESL, emergency services are.

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3.3.6	The primary mechanism for funding recovery is the Western Australia Natural Disaster Relief and Recovery Arrangements (WANDRRA), which is jointly funded by the State and Australian Governments.	By way of clarification, the State covers the cost of disaster events from consolidated funds. The Commonwealth NDRRA funding arrangement is based on the premise that the State's resources have been exhausted and it supports extraordinary costs. The Commonwealth pays 50% of eligible individual and community costs and contributes to the total costs of disasters once thresholds have been met.
4.3.3 (p93)	Although DFES is not responsible for undertaking natural disaster recovery activities, it does have a role in administering the State's recovery capabilities, through WANDRRA.	DFES does not have a role in administering the State's recovery capabilities through WANDRRA.
5.4	Footnotes 362, 363, 364 and 367.	Change to read: the "State Emergency Management Committee, 2016 Emergency Preparedness Report" (and not Office of Emergency Management, 2016 Emergency Preparedness Report).
5.4	In its 2016 Emergency Preparedness Report, OEM notes that increased density in such areas not only increases the potential losses in the event of a natural disaster, but also increases demand on emergency response and support services.	Change to read: "In its 2016 Emergency Preparedness Report, the SEMC notes"
5.5	Footnote 372.	Change to read: the "State Emergency Management Committee, 2016 Emergency Preparedness Report" (and not Office of Emergency Management, 2016 Emergency Preparedness Report).

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8.4.2	The Department of Premier and Cabinet is well placed to administer the ESL. This is because it is independent, does not benefit from the ESL and managing the ESL would complement its existing responsibilities for the Western Australian National Disaster Relief and Recovery Arrangements.	The Department of the Premier and Cabinet does not have existing responsibilities for the Western Australia Natural Disaster Relief and Recovery Arrangements.