

Our Ref: F161177
Your Ref:
Enquiries: Brian Robinson



10 August 2017

Economic Regulation Authority
PO Box 8469
PERTH BC WA 6849

Dear Sir/Madam,

SUBMISSION ON EMERGENCY SERVICES LEVY (ESL) REVIEW – DRAFT REPORT

I refer to the above draft report on the Emergency Services Levy (ESL) Review being undertaken by the Economic Regulation Authority.

The purpose of this correspondence is to provide the ERA with the Shire of Manjimup's comment on the ESL Review Paper. The attached table outlines the Shire of Manjimup's comments in respect of the recommendations being made.

I thank you for the opportunity to comment and ask that you contact me on 9771 7725 should you have any queries on the Shires submission.

Yours sincerely,

Brian Robinson
Director
Development and Regulation

Recommendation	Summary	Shire of Manjimup Comment
1	The basic structure of the ESL system should be retained.	The recommendation is supported.
2	Gross Rental Value should be retained as the basis for calculating ESL rates.	The recommendation is supported.
3	The agency that advises the Minister for Emergency Services on ESL and rates should benefit from the ESL.	The recommendation is supported.
4	The Office of Emergency Management should be given the oversight functions of advising the Minister for Emergency Services on the amount of ESL revenue required, and on ESL rates.	The Shire previously recommended that this function be performed by the Department of Finance. As the recommendation will ensure ESL oversight occurs independent of DFES, the Shire has no objection to the recommendation.
5	The Office of Emergency 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.	As per comment on recommendation No 4.
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 ESL funds.	As per comment on recommendation No 4.
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.	As per comment on recommendation No 4.
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.	The Shire has no comment to offer on this 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.	The recommendation is supported.
10	The ESL should be used to fund the preparedness activities of the Department of Fire and Emergency Services, the	The recommendation is supported.

	bush fire brigades and State Emergency Service units that have community-wide benefits.	
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.	The recommendation is supported.
12	The ESL should not be used to fund the costs of recovery.	As detailed in the Shire's submission on the previous issues paper, the Shire holds the view that recovery costs associated with high impact events should be funded from State/Federal Government Revenue, including the ESL where events are not covered through the WANDARRA system.
13	The ESL should be used to fund the administration costs of the Department of Fire and Emergency Services.	The Shire does not support this recommendation. It is the Shires view that the Salaries of all non-career Fire Fighting State Government employees associated with administration functions should be met through State Government revenue and not the ESL.
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.	The recommendation is supported.
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).	The recommendation is supported.
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 a rural fire service.	Parts a) and b) are supported. The Shire however holds the view that the salaries of State Employees associated with administration should be met by general State Government revenue and <u>not</u> the ESL.
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	The recommendation is supported.

	activities, and whether these activities may be funded from the ESL.	
18	Grouping of properties should be discontinued for the purpose of calculating the ESL.	The recommendation is supported.
19	A levy on boat registrations should be introduced to fund the direct costs of the Volunteer Marine Rescue Services	The Shire offers no comment on this matter as elected members have not formed a view on this issue.
20	Road crash rescue services should continue to be funded from the ESL.	The Shire offers no comment on this matter as elected members have not formed a view on this issue.
21	Landgate should conduct another review of land classifications in the Swan Valley to ensure that vineyards are classified appropriately.	The Shire offers no comment on this matter as elected members have not formed a view on this issue.
22	The Department of Fire and Emergency Services should implement activity based costing to allow for robust analysis.	The Shire supports any recommendation for the adoption of best practice and transparent governance.
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.	The Shire has no comment to offer in respect of this recommendation.
24	The Department of Fire and Emergency Services should implement the ISO 31000 standard across its business activities.	The Shire supports any recommendation for the adoption of best practice and transparent governance.
25	The Department of Fire and Emergency Services should finalise and implement the Capability Framework.	This recommendation is supported.
26	The Department of Fire and Emergency Services should require cost-benefit analysis to be prepared for all major funding allocation decisions.	Whilst the Shire supports this recommendation, the Shire holds the view that the assessment of funding allocations should involve risk based analysis, with an emphasis on localised solutions.
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.	The Shire has no comment to offer on this recommendation.
28	Grants manuals should be made consistent between all volunteer organisations where it makes sense to do so.	The recommendation is supported.
29	The Office of Emergency Management should consult stakeholders when: a. determining the ESL revenue to be	This recommendation is supported.

	allocated to stakeholders; and b. advising the Minister for Emergency Services on ESL revenue and rates.	
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.	The Shire has no comment to offer in respect of this 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.	The Shire supports this recommendation.
32	The Office of Emergency Management should prepare and publish an annual report on the ESL.	This recommendation is supported.
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.	The basis for this recommendation is not clear given a brochure is already provided by DFES on an annual basis.
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.	The recommendation is supported to ensure transparent governance.
35	The Department of Fire and Emergency Services should publish data in accordance with the State Government's Whole of Government Open Data Policy.	The recommendation is supported to ensure transparent governance.
36	The Office of Bushfire Risk Management should require local governments to publish their bushfire risk management plans and treatment strategies.	The Shire has no objection to this 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).	This recommendation is supported.