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Sub 104

**ACCESS FOR ALL Inc.****SUBMISSION TO THE HOUSE SELECT COMMITTEE ON THE RECENT  
AUSTRALIAN BUSHFIRES****Scope**

1. This submission addresses the Committee's Terms of Reference and argues that:
  - a. there is a need for more hazard reduction than is currently the practice on public lands to mitigate the devastation caused by bushfires;
  - b. further research to assist in hazard assessment and bushfire behaviour is needed to build on the body of work already achieved, notably, by the CSIRO;
  - c. Governments at all levels need to take a better cost-benefit approach to the management of public lands to ensure that the community, in general, achieves better value for money and avoids the economic and social costs associated with a doctrinaire conservationist approach that is based on poor science, emotive argument and the influence of a rowdy minority; and
  - d. State and Territory Governments need to review their bushfire management practices so that they support and utilise more efficiently the excellent and experienced volunteer firefighters by providing them with better co-ordination, more strategic direction and – most importantly – a voice in the development of their services commensurate with their commitment and contribution.
  
2. While the factors considered in arriving at the conclusions and recommendations are drawn chiefly from New South Wales' experience, Access for All considers that other States and Territories share similar problems of public land management policies and procedures, 'voiceless' volunteers and inadequate higher bushfire management. The conclusions and recommendations, therefore, should have wide applicability.

**Background**

3. Access for All Inc. is an incorporated association in NSW comprising over 450 members from all walks of life, principally in the southeast of NSW. The association members share a love of and concern for the Australian bush and the maintenance of access for responsible recreation, education and cultural enjoyment. Its aims, objectives and functions are set out in Annex A.
  
4. In this submission, Access for All seeks to speak on behalf of the ordinary people of the community who would otherwise be 'voiceless'. The material presented in this submission seeks to articulate the concerns of these ordinary people and to provide an alternative, balanced view of conservation compared to the 'mainstream' conservationist views.

**General Outline**

5. This submission addresses each of the published terms of reference and offers views on each. Where the limited resources of Access for All allow, research has been undertaken and considered opinions offered. In some cases, however, the association's resources do not stretch to undertake the necessary research. In these cases, Access for All offers recommendations on the directions further enquiry should take in order to arrive at a balanced conclusion. In some

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cases, these offerings will identify current deficiencies in research and suggest projects in need of further research to guide policy decisions.

#### **Extent and Impact of Bushfires (TOR (a))**

6. The extent of the bushfires is well documented and will not be laboured further here. Access for All lacks the resources to preform a comprehensive assessment of the environmental impact or to assess the impact on the private and public assets across Australia. However the Select Committee needs to take into account the following in gathering data on these aspects:

- a. Claims about the environmental impact must be tested carefully to ensure that they are based on good science and not merely emotive, alarmist, 'motherhood' statements. However, it seems likely that biodiversity has been adversely affected because some flora species (that would have survived 'cool burns') will have been destroyed and will not regenerate. Eucalypts, and other species that need fire to germinate, will take over to the detriment of other native species. The speed and intensity of the fires will most likely have burnt many species of fauna and destroyed their habitat, making regeneration difficult and slow. Research is needed to ascertain the extent of the damage. However the extent of the research needed and the time required suggest that it is unlikely to be accomplished before the Select Committee has to complete its report.
- b. The losses of public asset can only be ascertained with respect to public buildings, timber in State Forests and infrastructure. In National Parks, for example, flora and fauna are inadequately catalogued and their extent and economic value is practically unknown and probably unknowable.
- c. The impact on local communities is more readily ascertained. The obvious costs are a combination of uninsured and insured property losses and the cost of replacing/refurbishing infrastructure lost or damaged in the fires. The Committee can fairly readily ascertain these costs. Less obvious are the costs of lost production/wages and the like associated with the effort by volunteer firefighters. In many cases, these volunteers have used annual leave and rostered days off, so there is no obvious economic cost. However, Access for All recommends that the effort of volunteers be costed so that the true cost of the bushfires is ascertained. Without these costs, the economics of hazard reduction, wilderness declarations and neglect of national parks cannot be reckoned. Because the volunteers are principally from rural areas, these costings, when ascertained, should reinforce Access for All's contention that the costs of caring for the environment are falling disproportionately on the rural sector.

7. To summarise, Access for All lacks the resources to conduct the necessary research, but recommends that the Committee note the limitations of ascertaining the economic values of the losses due to bushfires of flora and fauna in National Parks, declared wilderness<sup>1</sup> and nature reserves. Access for All further recommends that, in addition to the readily ascertained costs, a notional cost of volunteers' inputs be added with a view to showing that the costs associated with bushfires and environmental care falls disproportionately on the rural sector.

<sup>1</sup> In this document, 'wilderness' generally means declared under the *Wilderness Act, 1987* (NSW)

### Causes and Contributing Risk Factors (TOR(b))

8. Access for All contends that the major contributing factor to the losses in recent fires is the systematic neglect of hazard reduction on public lands. While adequate, properly arranged hazard reduction would not have prevented the devastating fires of January 2003, it would have mitigated these fires' intensity and damage would have given emergency services a better chance of controlling them.

9. Significantly, in 2001/2002, the NSW National Parks and Wildlife Service (NPWS) had about 5.4 million hectares under management or 6.76% of the total land area of NSW<sup>2</sup>, performed prescribed burns on only 31 703 hectares (0.58% of its holding)<sup>3</sup> but burnt 595 388 hectares (11.04% of its holding) in 'on park' fires<sup>4</sup>. Contrast this with similar figures for NSW State Forests, where, in the same year it had 2 495 548 hectares under management, 24% of which was subjected to fuel management strategies that included hazard reduction and selective grazing. However, in the same period, State Forests lost only 3.5% of its estate to wildfires<sup>5</sup>.

10. Access for All commends to the Committee the work already covered in the report of the NSW Parliament's Joint Select Committee on Bushfires, particularly Part C. Section 1<sup>6</sup>. The difficulties imposed on firefighters by the closing off of fire trails is another contributing factor that should be addressed. The NSW Parliament's Report cited above also discusses this matter. Access for All is one of the groups that advocate allowing volunteer recreational groups to assist in the audit and monitoring of fire trails as proposed in the report<sup>7</sup>.

11. As a general observation, Access for All considers that existing arrangements for hazard reduction on private land are adequate. The instances where hazard reductions on private property have resulted in serious wildfires suggest that they are not common and factors, such as inadequate planning and execution, are to blame. On private land, grazing and responsible land clearing also contribute to reducing the risk and intensity of wildfires. Access for All expresses no opinion about management of suburban development at risk of wildfire.

12. To summarise, Access for All considers that short-sighted, ill-informed opposition to hazard reduction contributes significantly to the intensity and severity of wildfires, particularly in relation to public lands in national parks. State Forests in NSW appear to be more responsibly managed, while private property (farms, etc.), with isolated exceptions, are adequately managed.

### Economic and Environmental Impact of Hazard Reduction and Other Strategies (TOR c.)

13. Anecdotal evidence gathered by Access for All suggests the main opposition to hazard reduction burns comes from 'green' individuals and groups that claim the burns will cause

<sup>2</sup> *Annual Report 2001/2002*, NPWS, p12

<sup>3</sup> *op cit*, p67

<sup>4</sup> *op cit*, p69

<sup>5</sup> *Annual Report 2001/2002, Social, Environmental and Economic Report*, State Forests, NSW, p25

<sup>6</sup> *Report on Inquiry into 2001/2002 Bushfires*, Joint Select Committee on Bushfires, Parliament NSW, Legislative Assembly. (Sydney, NSW) 2002

<sup>7</sup> *op cit*, pp 45-46.

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'damage' to environment. This opposition is seldom well researched and/or is based on anecdotal, incomplete and, sometimes, misleading evidence about the likely environmental impact. Access for All knows of no case where the likely economic impact was taken into account in deciding hazard reduction strategies one way or the other. As with the environmental impact, consideration appears to be vaguely stated, inadequately researched and poorly articulated.

14. While the economic impact of **NOT** performing hazard reduction can be ascertained with a fair degree of reliability, the environmental impact is less easily measured in economic terms. Access for All contends that this is the vexing problem of most claims of so-called environmentalists; the claimed likely environmental damage cannot be balanced against the economic cost to the individual or the community and a reasonable decision made. Considerably more research is required into how to evaluate environmental impacts in economic terms so that rational decisions can be made. The Committee may like to address this matter in its inquiries and its deliberations.

15. One aspect often overlooked in arriving at the economic cost of fighting bushfires is the efforts of volunteers. Governments, at all levels, tend to regard the costs in terms of the cost to their respective treasuries and both insured and uninsured losses. Because the volunteers' labour costs do not appear on any Governments' accounts<sup>8</sup>, they are essentially regarded as a 'free good'. This is quite erroneous, as the volunteers' costs are borne, one way or the other, by the community. Therefore, so long as there are volunteer firefighters, the economic cost of fighting fires will always be mis-stated by Governments.

16. The contribution of volunteers also distorts the costs associated with hazard reduction activities. As hazard reductions on public lands are usually carried out by the land-holders employees (e.g., NPWS, State Forests etc. employees), the costs of hazard reduction are reflected in Government accounts. However, the costs of hazard reductions on private land (including leaseholds) is performed by the landholder and even assistance from Rural Fire Service volunteers shows up as no more than the fuel costs associated with using tankers.

17. Access for All advocates that Governments cost the contribution of volunteers at a notional, but equitable, rate in their calculations associated with the analysis of the costs and benefits of bushfire activities, such as fighting wildfires, hazard reduction and training.

18. This approach would seem to militate against hazard reduction activities because it increases the cost. However, Access for All argues that, generally, the slow-moving, 'cool burns' associated with hazard reduction allow most fauna species to move out of the way and avoid injury and death while assisting in the propagation and regeneration of many flora species. Against this, wildfires result in widespread injury and death to fauna and (sometimes, irreparable) damage to flora. Thus, hazard reduction must be regarded as a less environmentally damaging activity that reduces the likelihood of catastrophic damage.

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<sup>8</sup> Excepting, of course, the costs of compensation/rehabilitation of those injured during firefighting or training activities.

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19. To summarise, Access for All contends that there is compelling case for hazard reduction on both private and (especially) on public lands. However, balancing the extent and placement of hazard reduction activities is bedevilled by the inability to measure accurately the economic, social and environmental impact of wildfires. While more research is needed to provide reliable, workable models that compare each factor in (preferably) monetary terms, Governments need to take into account the cost of volunteers' contribution to arrive at a true cost to the community of fighting and suppressing wildfires. The Commonwealth could lead the way by instituting such research in, say, the CSIRO.

#### **Land Management Policies and Practices to Mitigate Damage by Bushfires (TOR (d))**

20. It is difficult to comment about land management policies and practices Australia-wide, however Access for All contends that these tend to be driven by emotion, poor science and determined, effective but misinformed political lobbying rather than good science and sound economic principles. In NSW, Access for All's principal sphere of interest, it is apparent that this is the case. Only NSW has a *Wilderness Act* that creates a special class of public land that effectively isolates bushland from the populace at large on the rather spurious ground of 'conservation'. Access for All's in-house research suggests that such land is a cynical political exercise to pander to the 'green' lobby while reducing the cost of Government's caring for it<sup>9</sup>. It is, effectively, a 'lock-up and forget' approach to conservation, seemingly, in the somewhat pious hope that such lands will stay 'natural' and provide undisturbed habitat for native flora and fauna.

21. Such policies are clearly misguided when one considers, for example, the experience of rural communities in the Cooma-Snowy Mountains area. In addition to regular predation by wild dogs that have sanctuary in wilderness areas and National Parks (NPs) on their sheep, rural communities have suffered the threat of bushfires originating in such places. While wilderness policies cannot stop wild dogs taking up residence, nor stop fires started by lightning strikes in these areas, the lack of access - and deliberate reduction of access - in such areas militates against effective measures to control and defeat such hazards.

22. The denial of access was examined at some length in the report of the NSW Joint Select Committee<sup>10</sup>. It concluded that encouraging responsible community recreation groups to monitor the bushland on the landholders' behalf could mitigate the risk of environmental damage from increased access. Access for All has advocated such an approach to public land management since its foundation.

23. As the extent of recent bushfires showed, the continuous 'band' of wilderness areas and NPs across the NSW and ACT borders renders firefighting extremely difficult. The policies that led to this situation need urgent review as they appear to be based on emotion and 'green dogma' rather than sound science and economic and social responsibility.

<sup>9</sup> This research is not available in a formal report, but is the result of compilation and analysis of a wide range of material by the principle officers of Access for All.

<sup>10</sup> Joint Select Committee on Bushfires 2002, Part C, Sec 1.5. Note that the report, in referring to 'landowners' means 'landholders of Public lands'.

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24. One example of this is can be found in the Southern Regional forest Agreement process in NSW. Information on biodiversity made available during the assessment showed quite clearly that flora and fauna species population targets in the region were generally fully met by existing areas of NPs and wilderness. Relatively small areas of State Forest were needed to meet the achievable targets at the 100% level but some targets would **never be achieved, regardless of how much public land was converted to NPs or wilderness.** This was completely ignored by the NSW Government, which, initially, unilaterally decided that timber production would be limited to the lowest level option considered. The decision was clearly driven more by a desire to appease the 'green constituency' than one based on sound science and the mitigation of undesirable economic and social impact.<sup>11</sup>

25. At another level, policies such as native vegetation preservation, tree preservation and restrictions on access to public lands all appear to be based solely or largely on environmental considerations. Economic, social and fire impacts appear to play no, or only a very minor part in the considerations leading to their adoption.

26. From these factors, Access for All concludes that there is an urgent need for Governments to review their policies on land management and to recast them in the light of science and economic and social responsibility. More research, by both Commonwealth and State authorities is needed into quantifying environmental factors so that they can be weighed against the economic and social impacts of, among other things, fire hazards and their management.

#### **Terms of Reference (e) and (f)**

27. Apart from matters discussed above and below, Access for All has little to offer on these Terms of Reference.

#### **Current Response Arrangements and Deployment of Firefighting Resources (TORs (g) and (h))**

28. These issues are considered conjointly because of their linkage.

29. Access for All contends that response arrangements and the speed of deployment across jurisdictions leave much to be desired. During the January 2003 fires in the ACT, for example, there were crews and tankers in the Snowy Mountains region from outside the area that were standing idle, with no further task in that region. These crews and tankers could have been deployed to the ACT quite rapidly, but for some reason were not. Access for All cannot say whether this was due to ACT authorities' ignorance of the crews' availability, their reluctance to call on out-of-area resources or a poor appreciation of the task ahead. However, the fact that these resources were not deployed and, seemingly, not even considered, suggests that there is a need to improve co-ordination across jurisdictions, to streamline response procedures and to train

<sup>11</sup> For a more comprehensive treatment, see: *Submission by Access for All Inc - Southern CRA Wilderness Assessment Report*, Access for All Inc., Braidwood, NSW, May 2001. The report is available on request to the Secretary, Access for All.

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and to practise the drills so that different jurisdictions work more smoothly and effectively together.

30. Allied to this is the phenomenon noted in the 2000/2001 fires in the Deua NP area. Volunteers on the fire ground became frustrated at the inability to conduct operations they saw as necessary in a timely manner because of the need for everything to be approved by Fire Control in Moruya. The fact that they had to communicate via the Braidwood Fire Control only added to the delays and frustration levels. There was a real sense that operations were being 'micro-managed'. Conversely, there was also a feeling that matters were not well co-ordinated at Fire Control Headquarters level because of time delays and the inability to muster resources when needed and in maintaining accurate states on water levels, tanker availability and locations. Professional and volunteer staff need better procedures and training in working at headquarters level to ensure that they support the operations on the fire ground and give subordinate commanders maximum autonomy in fighting the fire. The Defence Forces have grappled with this problem of command and control for some time and probably have some useful lessons to teach rural fire services in this regard in all States and Territories<sup>12</sup>

31. Access for All recommends that the Commonwealth conduct the necessary research to ascertain the necessary measures for adoption and then to conduct the required courses to train and practise authorities in them. The task appears to be one within the resources of Emergency Management Australia to conduct, although it will need the co-operation of the States and Territories to accomplish.

#### **Liability, Insurance Coverage and Related Matters (TOR (i))**

32. While holding no views on insurance matters, Access for All is concerned at the propensity – at least in NSW – for public landholders to sue and to prosecute private landholders when fires originate on private property and cross onto public land. The reverse seems to be the exception rather than the norm. This seems to be an inequitable approach to the problem. Public landholders frequently call on volunteers – many, themselves, private landholders – to fight fires on public lands and expect a response. However, these public landholders appear to exercise no reciprocity.

33. The problem goes deeper, when one considers the experience of private landholders during the 2000/2001 fires in the Deua NP area. To fight the fires in the NP, the NPWS sought permission to obtain access through private property. The NPWS undertook to make good any damage after the fires and was granted permission on that proviso. Since then, the landholder concerned has been fighting an uphill battle with the NPWS bureaucracy to have fences repaired and roads restored. His problem is particularly acute because he is contractually obliged to provide a trafficable road to a neighbour's property.

34. While the Committee can do little to alleviate this landholder's plight, it can and should recommend the unification of laws among the States and Territories so that there is equitable treatment of private landholders following bushfires. Matters that should be addressed include unified and equitable approaches to:

<sup>12</sup> Access for All made these points in its submission to the NSW Joint Select Committee on Bushfires in April 2002. A copy of the submission is available on request.

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- a. Liability for fires that originate on one kind of landholding and cross to another. In particular, public landholders should not enjoy immunity from prosecution or legal action for damage if fires originating on their holdings damage adjacent private lands and property.
- b. Compensation of private landholders, who provide access and support for firefighting operations on public lands, so that compensation is equitable, streamlined and prompt.
- c. Insurance, to avoid expensive court battles to settle liability between the insurers and public landholders responsible for the damage and to ensure that private landholders are promptly compensated with a minimum of red tape.

### **Roles and Contribution of Volunteers (TOR (j))**

35. The contribution of volunteers in firefighting is widely acknowledged as being invaluable and crucial to success in all of the recent fires across Australia. However, Access for All considers that the most valuable asset in the firefighting equation has been rendered largely voiceless and without influence in the determination of fire management policies, procedures and their own employment. This will inevitably result in disenchantment of volunteers and, ultimately, their reluctance to volunteer. Access for All considers that this would result in an unworkable, unaffordable situation in all jurisdictions.

36. That which follows is based largely on the situation in NSW. The Committee will need to determine the similarities and differences among the various jurisdictions and, therefore, the relevance of these comments to those jurisdictions.

37. In NSW, all full-time Rural Fire Service (RFS) officers are State Government employees and subject to operational, financial and policy control of the RFS Commissioner. The RFS supports Local Government by supplying full-time Fire Control Officers (FCOs) under a service contract arrangement. While volunteers are allegedly represented by the RFS Association, and have as many committee members as the full-time officers, the relative numbers mean that each volunteer representative has to speak on behalf of several thousand volunteers, while his/her full-time officer representative speaks for only a few hundred. However, no weighting appears to be given to this disparity in the Association's deliberations!

38. There are various advisory committees that purport to assist management in the RFS and these committees contain volunteer representation. However, no volunteer that is also a member of Access for All can recall when they, or even anyone of their acquaintance, was appointed to, served on or even asked to nominate or to vote on selection of a volunteer representative of any of these committees! This means that, in practical terms, volunteers are effectively voiceless in the management of the Service.

39. Under previous arrangements, where FCOs were local government employees subject to technical control of the RFS, the volunteers' representatives (in the form of elected councillors) were able to exercise a significant influence over RFS policies, operations and financial

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priorities. The current arrangements effectively silence the volunteers' voice as the professionals in the RFS handle all communication and volunteers are told not to communicate with the media. Local input to fires, especially, Section 44 events<sup>13</sup>, is actively discouraged and volunteers become little more than 'firefighting cannon fodder'<sup>14</sup>.

40. Another problem with the volunteers is the demands made on them for training. In rural areas, attendance at formal training is frequently difficult because of the demands of employment. However, when members are available, the courses are not on offer. There is obviously a need at local level to ensure that needs and student availability are better co-ordinated.

41. The changing demographics of rural and regional Australia also militate against a continued, high level of volunteers for the various rural fire services. In such circumstances, it is even more important to retain and encourage volunteer service. Access for All has evidence that there is increasing disenchantment, to the point of frustration, with existing RFS policies and practices as they affect volunteers<sup>15</sup>. Increasingly, volunteers are expressing views privately that they are fed-up with RFS policies and procedures and the volunteers' loss of any worthwhile input to them.

42. It is patently obvious that no State or Territory Government could afford the level of manpower to fight bushfires of the magnitude of the past several years without volunteers. However, in NSW at least, the RFS seems to be going out of its way to alienate the most important and, potentially, the most costly component of its bushfire fighting capability, the manpower currently supplied by volunteers.

43. In view of these facts, whether or not similar conditions apply in other States or Territories, it is important that those States and Territories create and maintain conditions that encourage a high level of volunteers for their respective bushfire fighting services. Such measures include:

- a. Giving volunteers a real voice in the development of bushfire fighting policies and procedures;
- b. Allowing the maximum local autonomy, consistent with applying adequate resources to firefighting tasks;
- c. Providing a more democratic and transparent process for the selection and appointment of volunteers to advisory committees at all levels. One option could be to require local government to nominate volunteer representatives and/or candidates for appointment.

<sup>13</sup> Events declared emergencies under S.44 of the *Rural Fires Act 1997*, where the fire has attained, or is likely to attain, a magnitude beyond the resources of the authority responsible for the area in which it is burning and becomes the responsibility of the RFS Commissioner.

<sup>14</sup> This opinion is formed from Access for All members' views as a result of their experience in both local and 'out-of-area' bushfires in 2000/2001, 2002 and 2003.

<sup>15</sup> For example, there is a special meeting of volunteers being held in the Orange Ex-Services' Club scheduled for 17 May 2003 to protest at the perceived mismanagement and red tape of the RFS's bureaucracy.

44. The Commonwealth could provide the necessary leadership and co-ordination to ensure that all States and Territories take a co-ordinated and uniform approach to increasing the input of volunteers, with a view to maintaining a high level of participation. If this attempt should fail, the consequences could be disastrous and extremely expensive at both national and state level.

45. To summarise: there is strong evidence that, in NSW at least, there is increasing disenchantment among volunteers that is discouraging their participation and likely to result in the demise of the volunteer as a force. However, it is patently obvious that substitution of a professional, even a part-time professional, service of the required scale is economically unaffordable. States and Territories need to encourage volunteers by giving them a voice in the development of policies, procedures and operations commensurate with their contribution. The Commonwealth could lead the way by co-ordinating the unification of policies and processes that will encourage volunteers' participation.

#### **Conclusions and Recommendations**

46. From the above argument, Access for All concludes that:

- a. More research is needed to quantify the value of the environment, particularly in NPs and wilderness, and the real, total costs associated with fighting bushfires so that a rational approach can be taken to hazard reduction and bushfire fighting.
- b. Hazard reduction on many public lands is being unduly inhibited because of ill-informed, emotive sentiment about the environment rather than on sound scientific and economic principles.
- c. Evidence exists that hazard reduction is being inadequately performed but further research is needed (say, in the CSIRO) to provide a better basis for determining the extent, frequency and timing of hazard reduction operations.
- d. There is an urgent need for State and Territory Governments to review their respective land management policies and to recast them in light of their economic, social and environmental responsibilities. More and better research is required to allow a better balance of environmental, social and economic factors than is currently the case and the States, Territories and the Commonwealth should jointly fund it.
- e. There needs to be better co-ordination and co-operation among agencies and across borders to allow a faster response to bushfires with maximum application of resources. There is also a perceived need for bushfire fighting headquarters to avoid 'micro-management' of operations on the fire ground and to support commanders on the fire ground better. The Commonwealth may have to co-ordinate the development of the necessary procedures and policies and conduct appropriate courses to train State and Territory services in their application.
- f. The Commonwealth needs to co-ordinate and unify States' and Territories' policies and procedures to streamline the provision of compensation arising from

bushfire operations and to ensure that private landholders receive prompt, equitable compensation when bushfires, originating on public lands, cross onto those private lands.

- g. States and Territories, and especially NSW, need to modify their policies and procedures to ensure that there is better co-ordination of training opportunities and student availability. They also need to ensure that volunteers are given a voice in the development of policies and procedures commensurate with their input so that volunteers will keep on volunteering. If the volunteers withdraw, no State or territory could afford to replace them, even with a part-time, professional service.

47. From these conclusions, Access for All recommends that:

- a. The Committee recommend further research be undertaken by the Commonwealth and jointly funded by the States and Territories to ascertain the value of the environment being protected and the real, total costs of fighting bushfires, so that a rational, scientific and economic approach can be taken to hazard reduction and bushfire fighting.
- b. Based on this research, States and Territories should review and recast their land management policies and procedures to conform to a rational decision-making model rather than basing them on ill-informed assertions by single-interest lobby groups that are well organised and noisy.
- c. The Commonwealth lead the way in reviewing and developing policies and procedures so that there is better cross-border co-operation, speedier disposition of bushfire fighting resources and better command and control practices in rural fire service headquarters organisations. The Commonwealth, through Emergency Management, Australia (EMA), should also develop and teach the necessary courses in higher, strategic command and control of fire operations in conjunction with States' and Territories' agencies.
- d. The Commonwealth co-ordinate and unify States' and Territories' policies, procedure and legislation to ensure equitable treatment of private landowners affected by bushfires originating on public lands.
- e. States and Territories modify their policies and procedures to provide better co-ordination of student availability and training opportunities. In addition, it is recommended that States and Territories give volunteers a voice in the development of bushfire fighting policies and procedures, commensurate with their contribution, to avoid the prospect of losing irreplaceable volunteers.