

Who are IBG?

The Independent Bushfire Group is a voluntary collaboration of non-aligned bushfire practitioners, fire managers, land managers, fire fighters and ecologists, with strong links to researchers. We came together after the Black Summer fires with a mutual interest in changes that would mitigate the impacts of similar disasters in the future. We are the only independent and expert voice on bushfire in NSW. The Group's experience covers every aspect of bushfire, and our 13 members have more than 450 years of collective experience across a range of fire landscapes in NSW, Victoria, Tasmania and WA. With a practical, evidence-based focus we advocate for better bushfire management in the face of climate change. More information is on our website.

What does IBG do?

We advocate for better bushfire outcomes, using multiple strategies to influence decision-makers and the public:

- We analyse bushfire events, combining our experience and knowledge with available information and consultation with firefighters
- We prepare and deploy reports and submissions
- We engage across the bushfire industry - firefighters, response agencies, land managers, researchers, community groups and politicians
- We engage with responsible media and issue media statements

What does IBG want?

Changes to fire management that will:

- reduce the risk to firefighters
- better protect communities by minimising the impact of wildfires
- conserve our natural and cultural heritage
- reduce costs

Why?

After the 2019-2020 fires IBG saw opportunities for less damage and disruption to regional communities and bushland with better suppression and preparation practices. We analysed 11 Black Summer bush fires and consulted on-ground firefighters to inform formal submissions to the NSW Bushfire Inquiry, the Royal Commission into National Natural Disaster Arrangements and the current NSW Coronial Inquiry into Bushfires.

These inquiries conducted their hearings in the absence of in-house expertise and without independent detailed operational analyses of what worked and what didn't across the 2019-2020 season. The NSW bushfires coronial will report more than 4 years after the fires started, and without detailed examination of basic issues. Historical failure of the inquiry-disaster-inquiry cycle to prevent crises is self-evident.

Progress Reports on implementing recommendations from the NSW Bushfire Inquiry have stalled and are now nearly a year overdue. Even so, reporting is limited to the status of

recommendations at action level but do not analyse progress toward the outcomes sought by the recommendation. A strategy to achieve the inquiry's vision for change (set out in the Executive Summary) was never prepared. Progress implementing Royal Commission findings is piecemeal and not transparent.

Not enough has changed since Black Summer. On our current trajectory Australian jurisdictions will not be in a much better position when the equivalent or worse fire season fuelled by climate change arises. Major losses of life, property and environment could happen as soon as the next major drought. Success will come from smaller fires, prepared communities and safer firefighting.

IBG response to the NEMA discussion paper

The IBG mostly engages on operational performance of fire suppression activities to make fires smaller. Combat operations are mostly within the ambit of state agencies. This submission covers the leadership role for the NEMA arising from the as yet unfulfilled recommendations of the Royal Commission into National Natural Disaster Arrangements for the establishment of accountability mechanisms across all jurisdictions and the unavoidable role for the Australian Government to make this happen.

What the Royal Commission found

The Royal Commission spoke adversely about siloing of commonwealth, state and local government roles in emergency management and instead called for shared responsibility. In recommendations 24.1 and 24.2 it called for accountability mechanisms to be established in the Commonwealth and in each of the states that had not already done so and gave the Commonwealth and states roles.

The following are extracts from the Royal Commission report.

From page 23:

Accountability and assurance mechanisms

36. Two Australian states have dedicated institutional arrangements to promote a culture of continuous improvement within the emergency management sector and to monitor whether recommendations of past inquiries have been implemented. Other states and territories should introduce similar arrangements, and the Australian Government should also have robust accountability and assurance mechanisms to support the national effort.

A greater role for the Australian Government

37. A national approach to natural disasters calls for the Australian Government to play a greater role than it currently plays. Generally, the Australian Government should complement, enhance and support the role of the states and territories. It should continue to be focused primarily on areas in which national consistency, coordination, overview and cooperation across jurisdictions would help the states and territories to manage natural disasters more effectively.

From page 33:

Our recommendations

Many of our recommendations identify what needs to be done, rather than how it should be done. This provides flexibility to governments in implementing recommendations to take into account jurisdictional and local needs. It does not, however, diminish the importance of implementation.

112. Australia has a history of more than 240 inquiries about natural disasters. Many of these inquiries would have been time consuming and costly, and great care and consideration was no doubt invested in them. While many recommendations have been faithfully implemented and have led to significant improvements, others have not.

113. Our recommendations should be implemented, some as a matter of urgency. Several will take time to achieve the intended outcome, but meaningful steps should be taken now towards timely implementation. Each recommendation would improve our national natural disaster arrangements, but taken as a whole, they will have greatest effect.

114. Implementing our recommendations calls for a cohesive and unified national effort. National natural disaster arrangements are a shared responsibility. Failure by governments to act on our recommendations will shift risk to others.

115. It is plain to us that the shortcomings that we have identified must be addressed. Progress on implementing our recommendations should be monitored and communicated nationally. If a recommendation is not accepted, reasons should be given, so that others know that they may need to act. Governments need to commit to action and cooperate, and hold each other to account. They should not prevaricate.

116. Australians need confidence in our national natural disaster arrangements. Implementing our recommendations will help to deliver this and make Australia safer. Australians expect no less.

From page 45:

Chapter 24 Assurance and accountability (page 501)

Recommendation 24.1 Accountability and assurance mechanisms at the Australian Government level (page 510)

The Australian Government should establish accountability and assurance mechanisms to promote continuous improvement and best practice in natural disaster arrangements.

Recommendation 24.2 An independent accountability and assurance mechanism for each state and territory (page 511)

Each state and territory government should establish an independent accountability and assurance mechanism to promote continuous improvement and best practice in natural disaster arrangements.

Recommendation 24.3 A public record of national significance (page 513)

The material published as part of this Royal Commission should remain available and accessible on a long-term basis for the benefit of individuals, communities, organisations, businesses and all levels of government.

The body of the report makes the case for establishing Commonwealth and state accountability mechanisms, the core attributes of accountability governance arrangements and why national coordination and communication is essential.

From page 502:

Chapter 24 Assurance and accountability

Summary

24.1 Inquiries into natural disasters are complex, time consuming and, generally, costly. They provide insights, observations and recommendations. Many recommendations are accepted by governments – and then disappear. Further, details of monitoring and implementation are not communicated to the public – and then there is another disaster and another inquiry, often into the same subject matter.

24.2 Australia has a history of more than 240 previous inquiries related to natural disasters. As a nation, we need to do more than just identify lessons from past disasters, we need to learn our lessons and follow through with action. If a recommendation is not accepted, reasons should be provided for doing so. If it is accepted, steps should be taken to implement as soon as practicable, and to monitor, and report on, the extent of implementation.

24.3 While state and territory governments maintain primary responsibility for management of natural disasters, Australian, state and territory governments should also be accountable for their respective responsibilities. This includes understanding and communicating the extent to which they are contributing to, and tracking, disaster mitigation, preparedness, response and recovery.

24.4 An approach to continuous improvement and best practice that has worked successfully for some states is the establishment of an Inspector-General for Emergency Management. Similar arrangements would be desirable for other jurisdictions.

24.5 This is the first Royal Commission to be convened into Australia's natural disaster arrangements at a national level. A large body of material has been gathered and analysed, contributing to a significant public record. The public work of our inquiry should remain available and accessible on a long-term basis for the benefit of individuals, communities, organisations, businesses and all levels of government.

National accountability for disaster risk and emergency management

The importance of accountability

24.6 Accountability is a core component of effective governance, made up of four key elements – transparency, answerability, enforcement and responsiveness.

24.7 In an emergency management and disaster risk context, accountability is required of all those with responsibility for disaster management on behalf of others,

including federal, state and local governments, businesses and non-government organisations.

24.8 The United Nations Office for Disaster Risk Reduction (UNDRR) highlights characteristics of accountability governance arrangements at these levels, including:

- *at the national level:*
 - *efforts by government agencies directed and coordinated towards disaster risk reduction*
 - *funds (eg from public sources) which are spent*
 - *information gathered by officials made more widely available*
 - *assets accruing to those institutions and other actors remaining under appropriate control, and*
 - *service to the community demonstrated.*
- *at the community level:*
 - *devolved structures that enable participation*
 - *access to information*
 - *capacities of communities to influence plans and actions*
 - *inclusion of vulnerable groups in decision-making*
 - *participatory monitoring and evaluation systems, and*
 - *high level of volunteerism for disaster risk reduction.*

24.9 As the UNDRR notes, ‘governments need to create the necessary conditions in order to make accountability a living reality. These conditions are appropriate policies, enabling legislation, necessary institutional arrangements or reforms, allocation of sufficient resources, definition of clear roles and responsibilities, and effective enforcement mechanisms’.

24.10 Australia has a long history of seeking to understand the causes and impacts of natural disasters, and how disaster arrangements can be improved. We identified more than 240 previous inquiries relating to natural disasters. 45 of those inquiries were at a national level.² Figure 98 gives an indication of the subject matter and timing of previous reviews across recent decades.

24.11 The existence of such a large number of reports may speak to the intractability of some of the problems, perhaps even a reluctance to implement recommended solutions.

24.12 For example, we learnt that recommendations, findings and directions from the last 20 years of natural disaster inquiries, roadmaps, strategies and frameworks have advocated for consistent disaster risk information, greater investment in national resilience and in mitigation of risk, and improved collaboration. Yet, based on the evidence available to us, many initiatives appear not to have been adequately implemented to date.

24.13 Determining the implementation status for many recommendations is difficult and for many inquiries, if examining solely based on publicly available information, impossible. Such information as was publicly available was not always readily accessible, consolidated, or comprehensive.

24.14 We required Australian, state and territory governments to provide us with information on the implementation of findings and recommendations of previous inquiries. Even with those responses, it remained difficult for us to assess the

implementation status of some recommendations, because that status was not always tracked.

24.15 Governments should be transparent about these matters, to enable better accountability to the public for decisions.

24.16 We have seen that governance and accountability arrangements have been improved in recent years within the emergency management sector with the introduction of external review and assurance bodies. Victoria and Queensland have Inspectors-General of Emergency Management (IGEMs), who have published updates or progress reports on the implementation of recommendations from the 2009 Victorian Bushfires Royal Commission and the 2011 Queensland Floods Commission of Inquiry respectively. In so doing, these offices have supported public accountability in addition to their core objectives of encouraging a culture of continuous improvement and best practice in emergency management within their states.

Conclusion

The IBG urges NEMA to fulfil the Australian Government role envisaged by the Royal Commission for establishing accountability governance mechanisms across its own and all state jurisdictions. The Royal Commission said that implementation was a *shared responsibility, and that progress should be monitored and communicated nationally*. No action has occurred to establish any new accountability governance system in any jurisdiction since the Royal Commission report was published and Australians have not been told why. Commencement of that work should be an outcome of the current discussion paper and, given the passage of time, with short deadlines for completion.

We would be happy to meet with NEMA representatives to elaborate on the above. To assist your work, the IBG brief for a new NSW Inspector General for Emergency Management can be downloaded from [here](#).



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