

6th December 2021

Blake Fire Service Act Review
Department of Police, Fire and Emergency Management
Hobart TAS 7001

Email: act.review@fire.tas.gov.au

TFPA Submission: Blake Fire Service Act Review

The Tasmanian Forest Products Association (TFPA) welcomes the opportunity to make comment to the Blake Fire Service Act Review.

The TFPA is the peak body for forestry that undertakes policy development, lobbying and advocacy for members interests. TFPA represents all elements of the value chain from the sustainable harvesting of plantations and multiple use natural forest resource including forest establishment and management, harvesting and haulage, processing of timber resources and manufacture of pulp, paper and bioproducts.

Fire management is not just about responding to fire. It is about taking action to prevent fires from starting and knowing how to reduce the impact of fire should one break out.

There must be a focus on reducing the incidence and impacts of unwanted fire through better land management practices. Changes include, to increase fuel reduction burning and further research to support a science-based approach to risk reduction and readiness.

Responses to specific recommendations below:

Recommendation 5: Do not combine the firefighting capabilities of Parks and Wildlife Service (PWS) and Sustainable Timber Australia (STT) with those of Tasmania Fire and Emergency Services (TFES).

We agree with this recommendation. The three entities have different roles to undertake, and the important aspect is communication between the entities to ensure a more coordinated and quick response to bushfires.

As per the Inter-Agency Bushfire Management Protocol to enable the safe and effective control of bushfires on public and private land across Tasmania, we highlight the importance of coordinated resources towards the prevention and preparation for bushfires. This is backed up by the Independent Review of the Climate Change (State Action) Act 2008¹ where it said that Tasmania is

¹ Jacobs Aust Pty Ltd (2021). Independent Review of the Climate Change (State Action) Act 2008 Final Report.

expected to experience longer fire seasons with more frequent and intense bushfires; increased occurrences of lightning ignitions; and compound extreme weather events.

Recommendation 12: Replace the Insurance Levy with a property-based levy or another funding source providing similar, and consistent (predictable), levels of funding.

The TFPA agree that the insurance levy needs to be replaced with a more equitable and sustainable tax. The current prescribed levy is an additional impost on those forestry businesses who take out insurance of up to 28% on top of their insurance premiums.

We support the move to a property-based levy to provide a stable and predictable source of funding for TFES.

Recommendation 28: Develop legislation that empowers TFES with functions, powers and indemnities that reflect its broader role in emergency management and response

The TFPA support indemnity for respective staff when operating under instruction of TFS.

We agree that authority and indemnity is also required to allow for quick response to fires in the landscape. For example, first response to fire when able to do so without waiting for formal instruction from TFS and approval to enter private land to address fire response. This should be a consideration not just for Sustainable Timber Tasmania and Parks and Wildlife Service, but also the private forest industry.

Recommendation 29: Inter-agency cooperation legislation

The TFPA support those undertaking fire control work should have authority and protections to undertake this work, including employees of agencies and employees and contractors of private forestry companies.

Plus, we believe the Inter-Agency Fire Management Protocol is an effective framework that aligns the three agencies (PWS, STT and TFS) and that these practices should be reflected in legislation.

Recommendation 34: Include the recommendations of the review of the fire permit system into new legislation as appropriate, including arrangements for total fire bans.

The TFPA agree that implementation of the recommendations of the Fire Permit System Review be included in legislation as appropriate, including arrangements for total fire bans.

It needs to be noted that the forestry industry has also taken the step of risk-based self-regulation, as highlighted in Blake Review Final Report, which are subject to overarching controls such as total fire bans.

The Fire Prevention at Forest Operations Procedure² outlines the minimum fire requirements for forest operations and procedures to follow to reduce the risk of fire including on days of total fire bans.

² Forest Industry Fire Management Committee (2019). Procedure: Fire Prevention at Forest Operations

We look forward to the next step of the Fire Service Act review process.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'N. Steel', written in a cursive style.

Nick Steel
Chief Executive Officer