



Department of Jobs, Precincts and Regions

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Ms Valerie Callister PSM
Chair Fire District Review Panel



Dear Ms Callister

Thank you for the opportunity for the Department of Jobs, Precincts and Regions (DJPR) to review and provide feedback on the Fire Rescue Victoria Fire District Review - Risk Assessment Methodology Discussion Paper. DJPR recognises the significant effort required to implement reforms to Victoria's fire services and appreciates the Fire District Review Panel's consultative approach.

The discussion paper describes the proposed approach for undertaking a quantitative risk assessment as the basis for determining recommendations to the Minister for Emergency Services. The paper balances both the benefits and weaknesses of this approach. DJPR suggests that, in addition to the likelihood of fire being examined as a function of past fire history, the quantitative risk assessment be complemented by using a forward-looking approach that addresses the increasing uncertainty the emergency management sector faces. This will assist in better understanding unfolding issues such as climate change and the expanding peri-urban population in both Melbourne and regional urban centres within Fire Rescue Victoria's boundaries.

The paper addresses impact in terms of hazard, exposure, and vulnerability. The recent emergency management reforms set out in the amended *Emergency Management Act 2013* and the introduction of the State Emergency Management Plan highlight the importance of community resilience and consequence management in emergency management sector planning. DJPR has significant responsibilities for managing cascading and compounding consequences that flow from not only events, but their management. DJPR suggests the approach outlined be augmented by an impact assessment method that more explicitly articulates community consequences resulting from fire and its management.

Local Government Area (LGA) boundaries should be considered when reviewing fire district boundaries to ensure each LGA is incorporated wholly into a boundary and not split. While councils can be consulted individually, councils could be consulted as one aggregated member of the Regional Emergency Management Planning Committees to promote an integrated process.

Councils' role for fire prevention is defined within the *Fire Rescue Victoria Act 1958* and *Country Fire Authority Act 1958*. This is a planning role only and centres around enforcement of fire prevention on private land. Councils also have responsibilities for managing their own land to ensure community safety including fire prevention works. Councils will undertake these responsibilities within their municipal footprints regardless of the fire district boundaries under which they fall.

From a rural and agriculture perspective, DJPR notes that in recent years there have been several instances of the detection of illegal stockpiles of waste materials posing significant fire risks. Not all of these were in areas covered by Fire Rescue Victoria districts. It would be helpful if intelligence-led analysis in any trends in such stockpiling is included in the risk review process. This may be particularly relevant as industries and the economy transform in response to the challenges of climate change.

The increasing trend toward distributed renewable energy generation and storage at scale should be considered as a specific risk given the challenges posed by fires at such industrial facilities. DJPR notes that increasingly some of these facilities will be concentrated in rural districts.

Thank you again for the opportunity to provide feedback. For further assistance or to discuss any of the issues raised in this letter, please contact [REDACTED]

Yours sincerely

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Local Government and Suburban Development
Department of Jobs, Precincts and Regions

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