



## Department of Environment, Land, Water and Planning

PO Box 500, East Melbourne,  
Victoria 8002 Australia  
[delwp.vic.gov.au](http://delwp.vic.gov.au)

Valerie Callister PSM  
Chair  
Fire District Review Panel

Dear Ms Callister

### **INTRODUCTION OF THE FIRE RESCUE VICTORIA FIRE DISTRICT REVIEW - RISK ASSESSMENT METHODOLOGY DISCUSSION PAPER**

Thank you for your correspondence dated 20 September 2021 about the Fire Rescue Victoria (FRV) Fire District Review - Risk Assessment Methodology Discussion Paper. We are grateful for the opportunity to have input into this important project.

As you are aware, the Department of Environment, Land, Water and Planning (DELWP), through Forest Fire Management Victoria (FFMVic) is a fire services agency under the *Emergency Management Act 2013*, and has a legislated accountability to respond to fires within State forests, national parks and on protected public land. Both the FRV fire district and country area of Victoria interface with this public land.

DELWP is supportive of the conceptual approach outlined in the methodology whereby risk is stated as a function of likelihood and impact. This is consistent with approaches being used by DELWP and the Country Fire Authority (CFA) through the Safer Together Risk 2.0 program to evaluate and communicate risk to life and property from bushfires (although impact is termed “consequence”, rather than “impact” in the Risk 2.0 project). In addition, the approach to assessing “consequence” as a measure of hazard, exposure and vulnerability represents the approaches being used for the assessment of bushfire risk across Victoria.

While we consider that the proposed methodology is conceptually sound, based on the information presented it is not possible to determine if it will be applied in a way that provides an accurate depiction of risk and estimates the likelihood of fire, and how the risk of bushfires is being incorporated.

The discussion paper indicates that likelihood assessments will draw on historical incident data from FRV and the CFA. It is unclear if this data includes incidents on public land, which have the potential to present significant risks to assets. Without adequate consideration of all incidents, the “likelihood” of impact will be significantly underestimated. Additionally, FFMVic undertakes extensive bushfire mitigation activities on public land that have a demonstrated risk reduction benefit. The recent advances in bushfire risk modelling developed by DELWP and CFA through the Safer Together program are considered world leading. As such, we believe any assessment of bushfire risk for determining FRV boundaries should utilise the assessment processes developed through the Safer Together Risk 2.0 team lead by DELWP.

The discussion paper also identifies that the development of the proposed risk methodology is guided by a safety and wellbeing theme representing “protection of life, property, and the environment”. While fire is generally considered uni-directionally in relation to life and property (e.g. it only has negative impacts), fire and fire management can have both positive and negative impacts on the environment.

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Reviews of the FRV boundary that consider environmental risk should explicitly consider the metrics and measures employed by DELWP.

Lastly, the proposed methodology has highlighted that it is guided by, amongst other items, the fire service capacity and capability. Phase 1 highlights that it will consider FRV and CFA capability and capacity data. While DELWP does not have a legislated accountability to carry out fire prevention or suppression within the country area of Victoria or FRV fire district outside of State forest, national park and protected public land, this bushfire risk is a significant contributor to fire risk in both the FRV fire district and country area of Victoria – particularly near the boundaries of State forests and national parks - and should be considered during this process. It would be prudent for any review to consider FFMVic's response capacity and capabilities, in addition to those of the CFA and FRV.

Thank you for considering my response. If you have any questions in relation to DELWP's feedback, please contact [REDACTED]

Yours sincerely

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[REDACTED]  
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22/11/2021