



Submission to the

**Senate Select Committee on Agricultural
and Related Industries**

Inquiry into Bushfires in Australia

July 31 2009

Preamble

The Victorian Farmers Federation is Australia's largest state farmer organisation. Victoria is home to 25 per cent of the nation's farms, and despite farming on only three percent of Australia's available agricultural land, Victorian producers are responsible for 30 per cent of the nation's agricultural product. As the leading representative organisation for farming interests in Victoria, the VFF speaks on behalf of our state's dairy, livestock, grains, horticulture, chicken meat, pig and egg industries.

Queries in regard to this submission should be directed to Graeme Ford, Executive Manager Policy.

Introduction

Major Bushfires in Australia are no longer isolated incidents, but an unfortunate feature of this harsh, dry landscape. There are a combination of factors that contribute to bushfires such as those seen in Victoria on February 2009 – wind conditions, temperature, humidity, and fuel loads. Of these, the only factor we can control is fuel loads. We must manage these responsibly to reduce, as far as possible, the likelihood and severity of further devastating bushfires.

These experiences however seem to fade into the background and the very harsh lessons re-learned. There have been numerous inquiries and a plethora of recommendations made by a variety of bodies. Some have been adopted and implemented, and others have been ignored.

There is capacity to implement measures to reduce the risk and potentially the magnitude of bushfires in Victoria. However, rather than pro-active fire mitigation, reactive fire management has become an accepted institutional approach, predictably resulting in large recurrent bushfires and loss of those natural resources. With new reports indicating that the upcoming fire season, expected to start as early as November, will be worse than the past season; it is imperative that Australian communities are better equipped and more prepared to deal with major fires.

Where the circumstances conspire to make the prevention and control of fires beyond us the risk to the community must be better managed. It is certain that uncontrollable wildfires will occur again, making the planning to minimise the damage and losses a community wide task. This may entail tradeoffs of other community aspirations.

A. The Impact of Bushfires

The impact of bushfires on human and animal life, agricultural land, the environment, public and private assets and local communities

There have been three major bushfires in Victoria within the last decade. Each has caused a great deal of damage to rural communities and agricultural business through the loss of livestock, productive land, crops, fencing, the diminished worker capacity due to fire fighting effort, not to mention tragic loss of human life.

The 2009 February Bushfires waged a particularly harsh toll on the Victorian agricultural community and Victorian farmers. According to statistics realised by the Department of Primary Industries (DPI) a total of 4,789 enterprises were affected equating to more than 227,524 hectares of agricultural land. An estimated 3,544 agricultural structures were lost including hay, wool, machinery and dairy sheds. Total stock losses are projected at 8,292 not including the 673,950 fish lost in aquaculture production. 13,399 hectares of fencing, including private boundary, internal, road boundary and crown boundary was burnt.

B. Extent and Effectiveness of Bushfire mitigation strategies

The extent and effectiveness of bushfire mitigation strategies and practices, including application of resources for agricultural land, national state forests, other Crown land, open space areas adjacent to development and private property and the impact of hazard reduction strategies

Prescribed Burning

There are only three ingredients for fire – oxygen, heat and fuel. Fuel loads are the only variable we can alter in bushfire situations. We can't control the wind, temperature or humidity conditions, but we can ensure that natural vegetation is safely managed to avoid dangerous build-up of fuel loads.

The VFF have consistently advocated for a more proactive prescribed burning strategy to ensure effective bushfire mitigation. Prescribed burning is a key method of reducing dangerous fuel loads. The VFF argue that inability to effectively reduce fuel loads is a major factor contributing to the cause of uncontrollable bushfires in Victoria.

The secretary of the Department of Sustainability and Environment has a legislated duty to conduct fire prevention. Section 62 (2) of the Forests Act 1958 states:

Notwithstanding anything to the contrary in any other Act or law it shall be the duty of the Secretary to carry out proper and sufficient work for the prevention and suppression of fire in every State forest and national park and on all protected public land but in any national park or protected public land proper and sufficient work for prevention of fire shall be undertaken only by agreement with the person or body having the management and control thereof and in case of failure to reach any such agreement as determined by the Governor in Council whose determination shall be final and conclusive

The major tool in the prevention of fire referred to above has been prescribed burning, and it is a legislated duty of the Secretary to ensure sufficient work is carried out.

'Fuel reduction burning does not happen often enough in forest reserves, especially in areas abutting private land. Property owners should be allowed to clear vegetation that poses a risk around their property, whether it be a risk to property or life, by way of fire or storm. The same applies to roadside vegetation. We understand that should be some guidelines but commonsense should prevail so that human lives are not put at risk.'

-Farmer Yinnar

'When we bought this land (near Kinglake National Park) in 1979 (as bare pasture land), the R.O. burnt the bushland regularly as a fuel reduction measure. This practice ceased in about 1984 in this area. After much complaining a token burn was conducted last April, but under such cold damp conditions that very little fire activity took place. Ironically, the part they burnt last year was the only part of the bush not burnt on Feb 7, 2009. The amount of fuel in the path of the fire storm was very great & probably contributed to the intensity of the blaze as the fire progressed from here to Skyline Road North and Steeles Creek to our east.'

'Clearly, more regular and more effective fuel reduction burning should be carried out in public bushlands to reduce the intensity of fires when they occur under severe weather conditions'

-Farmer St. Andrews

Prescribed burning and environmental or biodiversity values are not mutually exclusive. Use of fire as a land management tool is part of the Australian landscape history. The Department of Sustainability and Environment (DSE) states that 'many of our native plants, animals and ecosystems exhibit characteristics that reflect adaptations to natural stresses such as fire and drought,¹ and also that 'many species have developed specific mechanisms to survive periodic fire. Some even depend on it for critical life stages.'²

Recommendation 2.2 of the Parliamentary Environment and Natural Resources Committee report *'Inquiry into the Impact of Public Land Management Practices on Bushfires in Victoria'*, tabled in June 2008 'that in order to enhance the protection of community and ecological assets, the Department of Sustainability and Environment increase its annual prescribed burning target from 130,000 hectares to 385,000 hectares. This should be treated as a rolling target, with any shortfalls to be made up in subsequent years.'³

Removal of Vegetation

The regulations around clearing and management of native vegetation are far too stringent, and seem to be based on ideology rather than practicality. Application for permits to remove native vegetation can be a costly and onerous process for such a necessary purpose as public and personal safety.

¹<http://www.dse.vic.gov.au/DSE/nrenfoe.nsf/LinkView/784ACA76C411E70D4A2568E9000B66A7B79C5FE3BBF26AE74A2567CB000DB458>

² Department of Sustainability and Environment, 'Information Sheet: Using Fire to Manage our Parks and Forests'

³ Parliamentary Environment and Natural Resources Committee report *'Inquiry into the Impact of Public Land Management Practices on Bushfires in Victoria'*, 2008, page 95

'Planning needs to allow for more stringent clearing and protection from fire. This will reduce risk and still enable people to live in some of these lovely areas. At the end of the day, "the buyer beware"

'We really need to look at the fuel reduction program. The country has developed with burning as a natural occurrence for many thousands of years. If we police this better we can continue to live in harmony.'

-Farmer St. Arnaud

The *Native Vegetation Regulation Exemptions* in the Victorian Planning Provisions (52.17) are a good illustration of the currently complexity of native vegetation regulations. Site area exemptions from permits to lop, destroy or remove vegetation are limited to properties of less than 0.4 ha.⁴ This exemption is appropriate for lifestyle properties and hobby farms. However, the threshold for commercial farms, which are much larger, is also 0.4ha. This severely limits the amount of clearing for safety purposes a commercial farmer can undertake without undergoing a permit application purpose.

The provisions of clause 52.17 outline the rules around the removal of native vegetation under a variety of conditions. The extract below contains the exemptions for a permit requirement for the removal of native vegetation for fire prevention purposes.

As can be seen the exemptions are very limited and it is only vegetation overhanging a residence that can be removed without permit – and then only the overhanging part of the vegetation is allowed to be lopped. There are no exemptions to requiring a permit to remove native vegetation for the purposes of protecting property other than a residence.

No permit is required to remove, destroy or lop native vegetation to the minimum extent necessary if any of the following apply:

Fire Protection

- The native vegetation is to be removed, destroyed or lopped for fire fighting measures, periodic fuel reduction burning, or the making of a fuel break or fire fighting access track up to 6 metres wide.
- The native vegetation is to be removed, destroyed or lopped for the making of a fuelbreak by or on behalf of a public authority in accordance with a strategic fuelbreak plan approved by the Secretary of the Department of Sustainability and Environment. The maximum width of a fuelbreak must not exceed 40 metres.
- The native vegetation is a tree overhanging the roof of a building used for Accommodation. This exemption only allows the removal, destruction or lopping of that part of the tree which is overhanging the building and which is necessary for fire protection.
- The native vegetation is within 30 metres of a building used for accommodation provided:
 - The native vegetation is not a tree.
 - At least 50 percent of native shrubs are retained.
 - Native grasses are kept to at least a height of 100 millimetres.
- The native vegetation is within the distance of a building used for accommodation specified in the Table to Clause 52.17-7, provided:
 - The native vegetation is not a tree.
- Before the vegetation is removed, destroyed or lopped, a plan is prepared and submitted to the Department of Sustainability and Environment that shows, within 100 metres of the building:
 - The north-western and eastern zones of the building as shown in the Diagram to Clause 52.17-7.
 - The slope of the land and the direction of the slope from the building in each zone.
 - The vegetation type within each zone.
 - The native vegetation is on land in the same ownership as the land on which the building is located.
 - At least 50 percent of native shrubs are retained.

⁴ http://www.dse.vic.gov.au/planningschemes/aavpp/52_17.pdf

- Native grasses are kept to at least a height of 100 millimetres.
- The native vegetation is to be removed, destroyed or lopped in accordance with a fire prevention notice under:
 - Section 65 of the Forests Act 1958.
 - Section 41 of the Country Fire Authority Act 1958.
 - Section 8 of the Local Government Act 1989.
- The native vegetation is to be removed, destroyed or lopped to keep the whole or any part of any native vegetation clear of an electric line in accordance with a code of practice prepared under Part 8 of the Electricity Safety Act 1998.
- The native vegetation is to be removed, destroyed or lopped in accordance with any code of practice prepared in accordance with Part 8 of the Electricity Safety Act 1998 in order to minimise the risk of bushfire ignition in the proximity of electricity lines.

The March release of The Victorian Competition and Efficiency Commission's (VCEC) Draft Report, 'A Sustainable Future for Victoria: Getting Environmental Regulation Right' confirms this assessment of the cumbersome and ultimately counterproductive nature of Victorian native vegetation regulations. The report recommends that the Victorian Government simplify the guidance for assessing the quantity and quality of native vegetation. It notes that despite Victoria's 'complex' framework of environmental regulation,⁵ there has been an 'ongoing net loss in the quantity and quality of native vegetation' in Victoria over the past decade.⁶

Both private and public landholders must be able to safeguard their property by ensuring there is no unnecessary fuel for bushfires, for example in the form of dead trees and vegetation. The onus for protection of private assets falls to the private landowner. The landowner should be able to undertake works necessary to provide those assets with the best protection.

The native vegetation regulations should be overhauled to ensure they don't impinge on the reasonable right of private individuals to protect themselves and their assets from fire.

C. Bushfire mitigation/prevention strategies and practices

The identification of measures that can be undertaken by Government, industry and the community and the effectiveness of these measures in protecting agricultural industries, service industries, small business, tourism and water catchments

Any alternative or developmental bushfire prevention and mitigation approaches which can be implemented

The Decrease in Prescribed Burning in Victoria

Despite its benefits, there has been a decrease in prescribed burning in recent times. DSE's 2008 Annual Report states that 'in 2007–08, DSE, assisted by its Networked Emergency Organisation (NEO) partners, achieved a planned burning program of more than 156,000 hectares, the best result for more than a decade.' In the spring of 2007, 132 planned burns of 5,016 hectares took place, while 323 fuel reduction and ecological burns were ignited between 5 and 25 April 2008, treating an area of 109,336 hectares.⁷ In 2005-06, 49,000 hectares were covered by fuel reduction burns.⁸

⁵ VCEC, 37

⁶ VCEC, 19

⁷ Department of Sustainability and Environment Annual Report 2008, Report of Operations Part 2

⁸ Department of Sustainability and Environment Annual Report 2006, Report of Operations, page 63

The Parliamentary Environment and Natural Resources Committee report *'Inquiry into the Impact of Public Land Management Practices on Bushfires in Victoria'* states in Finding 2.3 that: 'The Committee finds that there is a need for an increase in the extent and frequency of prescribed burning in catchment areas to mitigate the risks associated with future bushfires.'⁹

Finding 2.2 of the same report also states that:

*'The Committee finds that the frequency and extent of prescribed burning has been insufficient over a number of decades, for the preservation of ecological processes and biodiversity across the public land estate. An increase in the extent and frequency of prescribed burning for the enhancement of environmental values should therefore be a priority for the Department of Sustainability and Environment and its partner agencies.'*¹⁰

Prescribed burning has, therefore, long been acknowledged as simultaneously benefiting biodiversity, and helping to mitigate bushfire risks. DSE's 2004 'Guidelines and Procedures for Ecological Burning on Public Land in Victoria 2004' recognises that 'fire has an important role in ecological management and that a balance needs to be reached between total fire exclusion and the regular burning of strategic areas primarily for protection purposes.'¹¹ This balance must be made a priority once more.

That Government response to recommendation 2.2 of the *'Inquiry into the Impact of Public Land Management Practices on Bushfires in Victoria'* outlined above

*'The Victorian Government supports this recommendation in principle. The Victorian Government supports planned burning to improve protection, conservation and production outcomes. However, the annual area treated by planned burning needs to be determined based on science and risk management frameworks and be subject to suitable opportunities as dictated by seasonal conditions. Given this, the Government recognises that the amount of planned burning will vary to take into account these factors. The Government supports a move away from focusing on hectare-based targets which may lead to inappropriate planned burning programs. They do not account for differences in the effort required for small area asset protection burns (often around settlements) compared with larger scale mosaic burns in more remote areas. The latter, while not providing immediate and apparent asset protection are important for achieving multiple outcomes. A combination of both is required.'*¹²

The evidence would suggest that insufficient fuel reduction burning is being carried out to provide adequate and appropriate protection to the community and the environment. Despite the Minister's comments above the 2009 State Budget Papers retain an area based target of 130 000 hectares.

'DSE are too scared to do fuel reduction burning because they are scared that the odd fire gets away...yet for the environment it is much better to accept the odd runaway fire because they are "Cool burns"; i.e. they do not do the environmental damage that midsummer wild fires do.'
-Farmer Leongatha

The VFF believes a significant increase in the efforts and resources applied to reducing fuel loads on crown land are required.

⁹ 90

¹⁰ Parliamentary Environment and Natural Resources Committee report *'Inquiry into the Impact of Public Land Management Practices on Bushfires in Victoria'*, 2008, page 86

¹¹ Department of Sustainability and Environment, 'Guidelines and Procedures for Ecological Burning on Public Land in Victoria 2004'

¹² Victorian Government's response to the Environment and Natural Resources Committee's Inquiry into the Impact of Public Land Management Practices on Bushfires in Victoria (2008)

The benefit of a hectare based target is that it is transparent and measurable; however if only token consideration is to be given to the area target an alternative system that is transparent and provides the community with detailed information of the fire risk factors within forests must be implemented.

The development of a prescribed burn plan that takes a risk based approach to establish priorities and urgency of reducing fuel loads would assist in providing this transparency. Triggers for burns could be based on risk factors such as the type of vegetation, terrain, fuel load and the proximity to population and private land. The relevant Department with responsibility for managing the particular piece of land should be required to publically report a fire risk rating for discrete areas of crown land.

The lower the level of risk for any particular area, the lower the priority to conduct a prescribed burn. As the risk factors increase, the priority and urgency for a prescribed burn also increases.

This approach would also direct the level of risk that would be acceptable in conducting a prescribed burn. If the level of wildfire risk to private property is low, there would be time to wait for the weather conditions necessary for a prescribed burn at a lower level of risk. As the risk of wildfire to people and property increases a higher level of risk is acceptable when conducting the prescribed burn.

This system also emphasises the wisdom in taking preventative measures before risk becomes too great. If burns are consistently conducted at low risk points, fuel loads are less likely to achieve high risk levels.

The VFF believes that a risk based approach would increase transparency, understanding and acceptance of prescribed burning. It would also provide an objective decision making process on the Department and guidance to Government on the level of funding required to manage the risk to communities. An additional step that could assist would be the establishment of regional fire committees with representative from landholders, Government land managers, Catchment management Authorities and the CFA. This committee would provide recommendations, advice and guidance on the management of crown land in order to manage fire risk.

Ability to clear near Fences

As mentioned previously, fences are an important asset for farm properties. The VFF argues that landowners must be able to protect their fences from potential fire damage, by clearing around them. The VFF position on clearance specifications is to the height of surrounding mature (fully-grown) trees, plus a metre, to ensure that fences won't be damaged by falling trees.

'We need to be able to cut down trees that are too near our house, not limit where we build. We should be able to clear fence boundaries to a reasonable distance. We were permitted to clear only four metres on the bush side, which is not a reasonable distance.'

-Farmer Tambo Crossing

The Interim Report of the Inquiry into the 2002-2003 Victorian Bushfires-August 2003 found that

"The most frequent criticism of the Government's relief and recovery policies relates to the fencing issue – specifically responsibility for the replacement of boundary and internal fencing burnt during a fire event. There is still significant anger in rural Victoria despite initiatives developed after the fires to support fencing replacement. The fencing issue contributes

*significantly to the generally poor relationship between public land managers and their private land neighbours.*¹³

The current policy settings of the Victorian Government disadvantage private landholders who have the misfortune of having the Crown for a neighbour in three ways when it comes to fences.

Current Victorian native vegetation regulations are inadequate for clearing for safety. A permit to remove, destroy or lop native vegetation is required when building a new fence on an individual property, and for any fencing operation with a combined maximum width of clearing either side of the fence above 4 metres.¹⁴

This exemption only applies to boundary fencing as a permit is required for the removal of any native vegetation for the construction of an internal fence. Once a permit application is required a need to provide offsetting native vegetation plantings is required. The offset calculations applied by the DSE result in a significant cost to landholders. Barriers such as these prevent landholders from taking measures to protect their assets increasing the impact of fire events.

In situations where a landholder adjoins the crown any removal of vegetation on the crown side of a fence requires the approval of the crown land manager.

This establishes a situation where the Government exempts itself from responsibility for half the fencing cost; makes it extremely difficult to clear vegetation from the fence on the crown side to afford the fence any reasonable level of fire protection; and then applies an effective 103 per cent tax on the insurance policy to protect the value of the fence.

Owners of private land should be permitted the right to carry out clearing activities to protect their property. In the case of the crown boundary farmers should be able to clear around fences to the height of surrounding mature (fully-grown) trees, plus one metre.

Fire Access Trails

It has been a common comment from VFF members over the years of a need for more focus on fire access tracks.

'When we first commenced farming here in 1979, the adjacent bushland (Kinglake National Park) had access/fire trails which allowed CFA vehicles to safely enter & exit from various spots, using the private land as a safe entry/exit point. In the early '80's our local CFA brigade regularly practiced in patrols on these trails.'

'With the exception of the Everard Track (along the North/South ridge), these have all overgrown and become impassable due to a lack of maintenance. During the 2007 Kinglake fire, I pleaded to have this maintenance done. (I even rang the ABC's 774 breakfast programme to make this plea.) Apart from a short track made to assist as a control line for the unsuccessful 2008 fuel reduction burn (see above), nothing was done.'

'No fire-fighting unit can be expected to enter this bushland with its difficult terrain unless a properly designed network of trails exists to ensure multiple entry and escape routes.'

¹³ Emergency Services Commissioner (2003) Report of the Inquiry into the 2002-2003 Victorian Bushfires Appendix III Interim Report of the Inquiry into the 2002-2003 Victorian Bushfires

¹⁴ http://www.dse.vic.gov.au/planningschemes/aavpp/52_17.pdf

The design, installation & maintenance of this network of fire trails should also be made a fundamental responsibility of the DSE/Parks Vic bodies for every piece of public land they manage.'

Farmer St. Andrews

Adequate access into crown land is essential in being able to safely direct fire crews into fires at their commencement in an effort to extinguish blazes at the earliest possible opportunity. While the use of aerial fire fighting has greatly enhanced fire suppression capability, on the ground crews are needed to ensure blazes are extinguished.

Construction and maintenance of access tracks at regular intervals and of appropriate standards are necessary across all areas of crown land. The spacing of tracks should be based on the level of inherent fire risk to private property.

D. Protecting Agricultural Industries during/after Bushfires

The identification of measures that can be undertaken by government, industry and the community and the effectiveness of these measures in protecting agricultural industries, service industries, small business, tourism and water catchments.

Capacity to respond effectively: preparation and fire fighting ability

Agricultural industries, due to location, are more vulnerable to the effects of Bushfires. The ability to protect these industries in the face of major fires must lie in the adequacy of preparation for such an event and the ability to fight when/if it occurs.

VFF have always argued that proper practical management of public natural resources, that form large parts of agricultural areas can limit the intensity and magnitude of fires. The state must practice pro-active fire management rather than reactive management which has arguably become the accepted institutional approach.

The preservation of agricultural industries also necessitates landholders to prepare private property. However, planning provisions limit the ability for landholders to effectively fire proof properties by obstacles surrounding vegetation removal. Protecting an agricultural business is largely the protection of land.

For the protection of Agricultural industries and surrounding communities is it essential that there is a certain level of awareness and effective risk communication. There needs to be good communication strategies placed to warn communities of the pending threat of fire.

There are issues facing local fire fighting abilities in the face of fire. Many agricultural communities face a diminished local firefighting capacity, largely a result of declining, and ageing populations. Over time this will make it more difficult to find sufficient volunteers to operate the fire services needed to protect the local community and travel to the aid of communities in other parts of the state. There are no simple solutions to this problem and long term planning for fire response must encompass the likelihood of a shrinking volunteer base in rural areas.

F. Planning and Building Codes

The appropriateness of planning and building codes with respect to land use in the bushfire prone regions

A fundamental tool in protecting people and their homes from fire is to avoid residential development in areas of high fire risk. The next level of protection is to require that the development occurs in such a way so as to minimise fire risk and maximise the survivability of residents. This can be supported by ensuring that access is as safe as practical in times of high fire risk.

The role of planning and the interaction with other policy areas must be examined. Care must be taken to ensure that subdivision and expansion in population does not occur where the fire risk is very high. Unfortunately the rural landscapes that many people seek in moving out of the urban area are the very areas that also have an inherent fire risk.

Obtaining balance between development and fire risk and the capacity for residents to undertake steps to protect the properties is necessary if populations are allowed to grow in high fire risk areas. Home design, fire protection systems, vegetation regulation and the safety of access routes must all be considered.

G. Fire-Fighting Resources

The adequacy and funding of fire-fighting resources both paid and voluntary and the usefulness of and impact on on-farm labour

Local communities and fire fighting abilities

Fire service management will soon need to overcome issues in relation to the ability for rural communities to sustain the fire fighting effort in regional communities.

The fire fighting effort in regional communities consists almost entirely of Country Fire Authority (CFA) volunteers. In the event of bushfires volunteers are called on to help fire containment which includes many farm workers and owners. As the competitive pressures on farm businesses inevitably grow and the scale and workloads on farms increase, the capacity for farmers to provide a reliable source of volunteer effort may diminish. The strong community spirit of the farm community will remain and farmers will continue to volunteer, however the capacity to spend pro-longed periods in other districts fighting fires will be diminished.

Community/CFA reliance on volunteers in the fire fighting effort also presents issues of sustainability. Many regional communities in Victoria have declining population and an aging population. The ability for many agricultural communities to sustain a fire fighting effort is therefore compromised. Professor Ross Garnaut, in his study on the small towns of East Gippsland affected by the 2003 Great Divide bushfire, highlighted the aging number of volunteers "*the number of active volunteers with the local Country Fire Authority brigade has declined dramatically and many of those who remain are aged over 60*".

H. The Role of Volunteers

The VFF have always believed that the Country Fire Authority and its volunteers are the backbone in rural Victoria's ability to fight fires. The scale of major fire events requires a force of labour that could

not practically be met by a standing workforce. This is also true of less severe fire events and the many other functions such as road accidents, that the CFA volunteer force perform.

The operating environment of the CFA must be designed to facilitate effective use of a volunteer force in a safe manner. The operational systems must also be structured so as volunteers continue to offer their services.

I. The Impact of Climate Change

Bushfires are a derivative of climatic condition. Change the climatic conditions and the chance and risk of bushfires will also be altered. If climate change leads to an increase in rainfall variability and a rise global temperature, this will undeniably raise the risk of bushfires.

Planning for the provision of fire services of the future must take into consideration the potential for increased fire risk and severity due to changes in climate. This would entail planning for more severe fire days and consideration of the impact on equipment and the volunteer force if multiple large fire events occurred over a short space of time.

In general there have been no more than one or two large scale events in any one fire season. While the events themselves last only a few days the mop up and recovery periods last for weeks. The ability for a volunteer force to conduct multiple fire campaigns over a fire season is limited. Volunteers generally have a job and rely on their employer being comfortable with the absence from work. Expecting prolonged and regular absences to be approved for volunteer fire fighting may test the generosity of some employers. Farmers, while self employed, have to put their own workloads on hold. There are limitations on the amount of time that can be devoted to fire fighting in other districts.

Volunteers provide their services for free, but it is not free to them. If demands on the fire services increases there may be a need in the future to provide some support to the volunteers to enable and encourage service.

L. Insurance Against Fires

Proper and fair funding of Fire Authorities

Proper and fair funding of fire authorities needs to be the cornerstone of effective fire fighting. While prevention and preparation are essential aspects to human and property safety in fire prone areas, fire fighting is truly the last line of defence.

Effective fire fighting obviously requires sufficient funding. The method of funding fire authorities in Australia is not consistent between States. In Victoria, the State government charges Insurance companies for 77.5% of the cost of the fire authorities and insurance companies then recover this expense through a fire service levy added to insurance premiums.

The magnitude of the Fire Service Levy (FSL) in Victoria differs depending on the type and location of property insured. In Regional Victoria, the fire service levy for commercial and residential insurance is currently 68% and 26% respectively. The FSL in Metropolitan Victorian is 51% and 21% respectively for commercial and residential insurance.

The Victorian Farmers Federation has long advocated reform of the funding arrangements for Victoria's fire services, in particular, the abolition of the fire services levy on fire and property insurance premiums.

Victorian farmers support reforming the fire services levy because of the clear inequities of the system where the Country Fire Authority provides a protective and emergency response service for the whole community but is being paid for only by those who insure. The levy makes it more expensive for farming businesses to manage risk by raising the cost of insurance and provides an incentive for people to under-insure (or not insure at all).

In addition to paying for the service through insurance, farmers experience the inequity of the current system when they serve as Country Fire Authority volunteers, donating their time and resources for the benefit of the community, including those community members who do contribute and those who do not.

Farming is the foundation of the rural economy and farmers have traditionally been very active volunteers and officers in CFA rural brigades.

Insurance is a necessary cost for farm business risk management with threat of fire damage to fences, crops, stock, structures and equipment and need to manage risk for other natural disasters affecting production and public liability.

Rising insurance premiums and very high levels of taxation on insurance make it more difficult for farmers to afford adequate cover, impacting on the types of production some farmers may undertake.

The VFF is not the only voice supporting changes to the insurance system and funding of the Fire Authorities. In the government response to the 2003 bushfire inquiry^[1] the Victorian Government agreed that more needed to be done to encourage the uptake of insurance. This problem was also identified in the Victorian Review of State Business Taxes review (2001).

The most obvious way to increase the affordability of insurance coverage is to remove the fire services levy from insurance policies and fund fire services through a broader based and more equitable system that all who benefit from the provision of fire brigades contribute.

^[1] Victorian Government Response to the Report of the Inquiry into the 2002-2003 Victorian Bushfires, Pg.5