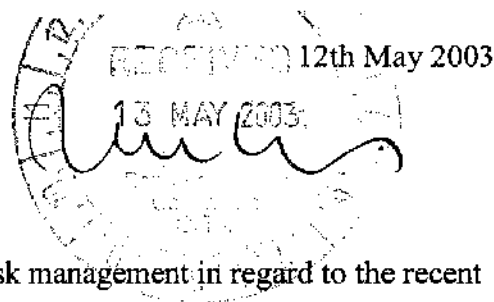


Federal Fire inquiry
CANBERRA



Dear Sirs,

Thank you for taking up this important matter of reviewing risk management in regard to the recent bushfires.

As you well know, the reality of bushfire has woken some up to the nature of the big picture . However, for all us involved with the real world , really changing the way things are done will take a much more profound and pointed poke at principals held precious.

I wish you well in that attempt because it's important ,it's not easy, and because lots of rural people depend on a very big shake to tightly held government views over the way they do things in this area. Some of us can help, because we know how to do sound risk assessment in the country: both efficiently and effectively.

This letter is largely to address some big picture issues, so I will not be going over the important complex interrelationships between fire , fuel and institutional behavior that will be, no doubt be well addressed by others making submissions to your inquiry. The principles outlined below apply directly to proper understanding and action in relation to risks and management of biodiversity , fire ,soil, forest and the dynamics associated with natural and man induced cycling.

As a matter of considerable urgency and implication though , I would ask you to consider several serious weaknesses in the current whole of government approach. Many of the risk analysis systems in place are faulty and can and must be changed to ones that are proven, more accurate and more complete..

I am attaching several of my personal letters, and encourage you to refer to several websites of interest. While the detail in this response is severely limited by having to take leave to write, I hope your inquiry starts to melt the iceberg of threat out there in the real world outside cities that will remain while competent professionals are not encouraged to do their job for the safety of citizens and our heritage.

A list of recommendations also appears at the bottom of this letter. An acknowledgement of receipt would be appreciated .

Yours sincerely

John Modra
COLAC

THE ISSUES IN CONTEXT

This is an incomplete list of suggestions. For more see updates on the websites

Aims and terms of reference issues

1. To ensure that the inquiry is big picture enough to actually change the way things are seen as well as the way they are done. Only then will change and review be effective in reducing risk and stress for the long-term.
2. That terms of reference be expanded to include a review of the effectiveness of broad scale environmental assessment methods of all kinds as currently practiced.
3. That inquiry be practical in focusing on aims and implementation issues.
4. That areas of unacceptable complacency and exaggerated risks be contrasted.
5. That place driven decision-making and deferring to paper be contrasted.
6. That removal of unnecessary stress and silencing of ignorance be key aims.
7. To inquiry focus on what actually works in practice in the field (biodiversity and fire protection etc).
8. Real World Choices: Bad policy well implemented or good policy badly implemented.
9. To reduce duplication and wasted effort
10. To make clearer and shorter-the lines of responsibility
11. To focus on prevention rather than blame , shutting doors or winning media attention

Threats

1. Good governance is being stifled by a poor understanding of how to establish boundaries and prevent problems and threats. Prevention is our main responsibility in regard to risk management. A sustained focus on it makes the system work efficiently, but some ideologues are determined to impose models that don't work in health care.

Here is one symbolic example of how we have lost sight of the prevention angle In Victoria, the 1.5 km boundary on private land was effective in saying who was responsible for preventing a possible failure with fires out of control. The common modern fallacy now though is that a problem begins at one's boundary. This is indicative of the reactive self centred myopic view of the world that clearly works against good governance- against the principle of protection and seeing a problem coming;

Risk assessment is also not something you can do easily inside the tight briefs so often now clogging up the corridors of power and paper warfare pushers.

Governments must be more proactive and effective in assessing actual risk and preventing damage by insisting on measures which actually look beyond the boundaries and make decisions about real land and resources.

Private practice models of efficiency are by their very nature myopic. Governments must rerecognize their historic role and mandate as risk assessors. To do this effectively in the future, representatives must relinquish their addiction to narrow minded views of efficiency inherited from the private sector.

There is a lot more to discuss here, but time is short . Later?

2. Government's withdrawal from effective risk assessment in the last decade

What has been most disturbing over the last ten years has been the gradual withdrawal of engagement by public servants from the hard job of risk evaluation. You may not accept this, but I ask you as one who deals with the consequences each week in my work, to take in it on board. Many things have contributed to this failure (too many to go into here). I would be happy to address them in more detail if you desire. Anyone who has ever worked in the public service knows it's easy to do what's easy and by adopting the principle of purchaser-provider your staff have never had it so easy.

Unfortunately, one of the biggest changes you are going to have to make if you are going to be effective is to convince parliament that there is more than one paradigm of good governance. Competition policy and contracting out will not work in some areas where prevention and risk assessment are crucial. Responsibility and accountability are often the sensitive but essential ingredients that are lost in such unnecessarily long and drawn out approaches. Surely you are aware of the blind enthusiasm that so often precedes the ultimate recognition of a blinkered approach. I do not believe that good governance can continue to ignore the lack of big picture thinking and prevention focus on environmental and health matters that is inherent in wholesale adoption of many myopic industry models. If you don't agree with me I would like to know why.

3. Duplication and divulging of responsibility. Instead of reinforcing the short sweet connections of responsibility, government changes have duplicated responsibilities in risk management areas and made decision-making even easier to avoid by allowing more and more institutions to attempt to do the same things (especially local and semi government organizations who operate at arms length) Resolving confusion over this issue will not be easy but can be well assisted by other recommendations made and by adopting *The Principle of Subsidiary Function*

Weaknesses Currently

Look at the adverse and ongoing consequences of current government approaches

- **Even leaders are losing sight of the efficiency of prevention.** We know Media imperatives are reactive rather than proactive: Prevention pays but it's not what the media says. "We 'd rather you would waste money so we have some drama for tonight's TV " Its not sound to think "Elvis" is good value for firefighting", but we ask you to do what private interests are not doing - budgeting past the next day and beyond the next potential disaster. *We accept that some drama is inevitable, as long as our leaders do not forget the main game --- our key role as prevention strategists.*
- **Rural depression/ City patronage** You expect the fittest to survive in the harsh realities of both nature and economic greed.It doesn't happen that way! This faith eads to a sleepy kind of abdication or level of patronizing that gets up people's noses. It's a disease you catch very easily inside the comfortable confines of cities.
- **Spending more but deciding less** In Victoria, Mr Kennett and others' love of al things private has demoralized dedicated public servants in a way in which is very serious . Little effective work has been done to root out this attitude out of the areas where it continues to undermine the very dedication that is sought. Its almost become self fulfilling prophecy except "it used to work OK"
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- **The nonsense that decisions come out of books and strategies continues**
- **Less and less dedication to decision making on risk matter** If my AFL relative were treated the same way as public team members have been treated for the last decade, the government would lose every game. If you want to win this difficult game of preventing a costly explosion, you need to change the strategy and encourage those who know ecosystems well enough to make decisions that prevent impacts.
- **Preservation and small picture ideologies limiting vision and expenditure**

The weaknesses in current biodiversity protection preoccupations and other inadequate types of complex system analysis should be more widely known see ref Our Parks Otways submission.

The scenario – more questions than you can answer without a paradigm shift!

My point is that a lot of the current failures are predicatable and completely unnecessary- being too reactive in style and strategy amongst other things. This appears to come from a lack of self and system belief. Has parliament now become so efficient that ministers have no-one to disagree with them? Has the environment and our use of it suddenly become so simple that just about anyone can pontificate about how to look after both us and them ?

Reviewing risk matters – a personal view

In addition to working in risk protection evaluation in rural parts of the State of Victoria for over 25 years, I have also run the family farm for 30 years. From this dual perspective, I consider myself effective in terms of giving rural custodians a clear idea of whether their proposals are sustainable or not, and in what circumstances. As a university graduate with geochemical, landscape, soils and biosystems evaluation skills, and as a Native Vegetation administrator, I regularly have to resist unreasonable pressure to stop people touching sacred objects such as trees and branches. It's not getting any easier to do my job as an adjudicator of sound risk assessment.

What I notice in both capacities, is that risk estimates must be done by an independent person. Fire, drought and floods affect systems that are complex and which must be understood before action and impact risks can be evaluated. This is not to diminish the competent learning of those who live near the bush and who then have acquired a sound understanding of these issues. Rural custodians skills are a lot more close to real risk evaluation than the idealistic if well intentioned twaddle we have to bear as daily news . . . One of the problems with being too close to risk issues is that you can be prone to deny or diminish them. The converse problem is that, if you are far away, you may observe something important for the big picture but no really know how to engage participants in resolving risk issues in away which only they can . These two tensions make it essential to have locally accountable place and people driven risk assessment by government observers in regional areas.

I trust you will take the huge weight of sound evidence for more direct use of local competence from other submissions and dump it on the ignorant in government who continue to ignore it.

Summary

Rather than go into great detail, I have sought to remind you of the consequence of simplistic market and mechanism driven approaches to good governance. I am not for one minute suggesting that we need more public servants per se. We do need more public servants whose PD is to make decisions-- not manage contracts.

On the positive side, if we exercise wisdom in the application of democratic and professional principles, much of the stress felt by rural people over risk management will diminish. This includes the reduction of Nimby-ism, nanny-ism and their many adverse effects, and huge inefficiencies . see ourland website

Precision in decision and prevention strategies are required. Both were hallmarks of democracy and conservation before the preoccupation with elementary efficiency became common. As public servants we must think bigger or die . We both share the mandate of prevention as a key responsibility and perspective as a key tool in risk management. Don't ditch us, like some of you have been. In practice, purchaser-provider relationships often work against the acceptance of

responsibility by public servants. No new tools are required except by those who live on quick fixes.

Santayana, who is well known for key words on fanaticism has some words on progress which , I think are equally relevant to the future of environmental protection “Progress,... far from consisting in change depends on retentiveness....Those who do not remember the past are condemned to repeat it”.

Recommendations

1. That you change the terms of reference to make sure your inquiry is truly effective in the long term and not some “I told you so, after the horse has bolted “
2. That you recognize the enormous stress on country people because of unpredictable and unreliable environmental assessment systems .
3. That you seek to set in place more robust and effective risk management strategies and evaluation systems;
4. That you insist that locally accountable persons and structures are in place.
5. That you call for less duplication of roles and immediate further review of existing role confusion;
6. That you extend, for environmental health prevention sake, the review of role confusion in other linked risk matter evaluations (water, soil and biodiversity protection);
7. That you recognize the danger of reactive approaches and adopt regional governance approaches which focus on accurate risk assessment and the need to deal properly with complexity in time and space. (whatever the issue)
8. That you call for a more rigorous review of who is actually doing objective risk management and support them;
9. That you encourage the reinstatement of *The Principle of Subsidiary Function* (Schumacher) in institutional structures.
10. That you seek to remove excessive confusion about roles and promote “that it is essential to have locally accountable and flexible place and people driven risk assessment by government observers in Regional areas.’
11. That you keep up to date with the debate on the ourland3.tripod.com website- for environmental health issues . <http://usersgsat.net.au/tuf> -for governance issues

PS I am sending you via snail mail a copy of this submission and a CD of interviews with locals on the subject Please contact me via email if you have any queries.

John Modra
Colac