

## The Independent Review into South Australia's 2019-2020 Bushfire Season

('the Keelty Review')

The purpose of this report (**'the Summary Report'**) is to provide an overview of the Keelty Review and identify issues of relevance to the local government sector and provide a response. It also makes reference to the LGA Submission to the Keelty Review, the LGA Submission dated March 2020 (**'the LGA Submission'**).

This Summary Report will be presented to the LGA Board for noting. The headings used below replicate those of the Keelty Review (in bold) and the comments in blue text boxes reflect issues of interest to the LGA.

The Local Government Functional Support Group (LGFSG) also undertook its own lessons management process following the 2019/2020 bushfire season and a confidential report was presented to the LGA Board on 21 May 2020 (**'the LGFSG Report'**). The LGFSG Report was considered in the preparation of this Summary Report but it is not directly relevant as the LGFSG Report is confined to recommendations for the LGFSG.

### Executive Summary:

Dated June 2020, the Keelty Review was announced on 28 January 2020 in response to a devastating bushfire season. Over 576 submissions were received. The Terms of Reference for the Review did not include an investigation in to causes of the fires.

The Keelty Review praised the efforts of all agencies involved in the crisis. It identifies the achievements of key agencies which contributed to the response.

**Response:** the list of key agencies does not include local government or the LGA.

Given the significant contribution made by the local government sector and the LGA during the bushfire crisis, the role of the local government sector warrants recognition. The LGA Submission articulated this contribution as follows:

*"The coordination offered has seen support from 220 council employees and 68 units of plant and equipment from 34 councils provided on the ground in bushfire affected areas. Many of these councils provided support to multiple events. For example, twenty-three councils supported Kangaroo Island Council during that bushfire, and nine councils supported the four councils affected by the Cudlee Creek fire.*

*These contributions involved plant and equipment as well as human resources and sent a powerful message about the connectedness of the sector and the ability to respond flexibly in a crisis."*

## Governance

In examining Governance, the Keelty Review notes a series of challenges:

- Inaction from previous reviews
- Governance arrangements of the State Bushfire Coordination Committee (SBCC) (reporting to the CFS)
- Role of SAFECOM in enabling emergency service agencies to do their job
- Governance of SAFECOM in its Chief Executive chairing the SAFECOM Board
- Need to separate Emergency Services portfolio from the Emergency Management portfolio

*Response:* The SBCC is a key committee for the LGA to progress advocacy issues therefore it is invested in seeing the SBCC demonstrate good governance. The LGA has a nominee appointed to the SBCC and it is important that the nominee is well-connected with LGA issues.

## Continuous Improvement

In considering continuous improvement, the following issues were identified in the Keelty Review for improvement:

- Planning to protect critical assets
- Training and equipment for volunteer brigades
- IT and data systems integration
- A single source of truth and other information for community and stakeholders

## Recommendations

The recommendations of the Keelty Review are to:

1. Implement previous review recommendations for bushfire management including those relating to the 2009 amendments to the *Fire and Emergency Services Act 2005*, State Bushfire Coordination Committee operation, State Bushfire Management Plan, as well as urgent completion of Codes of Practice for fuel hazard reduction on all land tenures, and redevelopment of Bushfire Management Area Plans accompanied by effective community engagement to build an understanding of risk.

*Response:* The Keelty Review identifies a lack of on-ground bushfire mitigation action across all tenures (private and public land) as a particular concern. The LGA supports this recommendation.

The LGA has a nominee on the SBCC and is keen to leverage the participation of that nominee to further strategic aims of the LGA.

The LGA supports the recommendation that the SBCC requires executive support.

The LGA seeks implementation of a Code of Practice under s.105 of the *Fire and Emergency Services Act 2005* to better support local government Fire Prevention Officers (FPOs) in their work.

Councils make a significant contribution to bushfire mitigation, both through managing council land and regulating the management of private land through s.105. This is an important role of councils, which can support greater mitigation action. Greater support for council FPOs to better report fire prevention activities, such as through the Local Government Research and Development Scheme-funded pilot project of the Bushfire Risk Information Management System (BRIMS) software would support the implementation of this recommendation.

**2. Align risk assessment tools and processes to Risk Management Standard ISO 31000 and the National Emergency Risk Assessment Guidelines (NERAG) and communicate these on public-facing platforms. Make Bushfire Management Area Plans (BMAP) accountable for managing and reporting on region-specific risk and identifying critical infrastructure such as mobile phone towers as key risks.**

*Response:* Further funding for the existing Local Government Research and Development Scheme project would support the achievement of this recommendation.

This recommendation in the Keelty Review refers to BMAPs being accountable for managing and reporting on region-specific risk. The Local Government Research and Development Scheme has supported a joint project between the Country Fire Service (CFS) and the City of Tea Tree Gully, creating a pilot recording and reporting system that allows an authority, such as a council, to record treatments undertaken to mitigate a risk against an asset identified by the CFS. This project will allow councils to identify their assets and track bushfire risk mitigation works against each asset and requires further funding to be completed.

It should also be noted that the alignment of risk assessment tools and processes to the NERAG is embedded in LGA advice to councils through the *South Australian Emergency Risk Management Guide: A guide for Local Government in how to undertake emergency risk management using the National Emergency Risk Assessment Guidelines 2015*.

3. Consider amending the *Fire and Emergency Services Act 2005* to align SAFECOM Board operations with accepted governance standards with the Minister appointing an Independent Chair of the SAFECOM Board. The SAFECOM Chief Executive should report to the Board and maintain SAFECOM's role at the direction of the Board. Alternatively, SAFECOM could be abolished, moving to a model of a Department of Fire and Emergency Services where the departmental head reports to the Minister but the value proposition of any such machinery of government change would need to be thoroughly examined.
4. Invest in upgrading and integrating ICT platforms to eliminate manual data transfers, and ensure IT and radio communication interoperability across the agencies, together with a dedicated focus on the development of a coordinated risk intelligence capability to provide all stakeholders with a common operating picture and rapid damage assessments.

*Response:* The LGFSG would support and benefit from the creation of and integration of a common operating picture and rapid damage assessment tool that is assessable by other agencies including Local Government in a 'real time' format.

5. Clarify and streamline processes and educate the community about their roles and responsibilities in managing native vegetation to improve hazard reduction on both public and private land. Provide additional resources to manage fuel in a shorter off fire season and develop a risk reduction target linked to prioritised objectives.

*Response:* The SBCC has identified the need to prepare such a Code of Practice under s.105 of the *Fire and Emergency Services Act* to support the work of local government FPOs but this work has not been completed. The LGA has raised the issue with the Minister in a letter dated 30 June 2020 so supports this recommendation.

The Keelty Review notes that the level of fuel reduction permitted on private land is unclear and there is an inconsistent approach to compliance action (s.105 Notices) to reduce fuel hazards.

The Keelty Review also states that the role of local government in fire prevention diminished when the *Fire and Emergency Services Act 2005* was amended in 2009 as the local government sector no longer had responsibility for managing Bushfire Prevention Committees. Councils still retain a role in education and land management and the Keelty Review states that some councils reduced resources committed to fire prevention activities.

The need for greater focus on building community resilience was the focus of the LGA Submission Recommendation 2:

*That the State Government works with the LGA to implement a Community Ready program to support councils to further build disaster resilience within their communities.*

- 6. Consider removing stamp duty from home insurance to encourage a wider section of the community to take out insurance. South Australian government agencies should share their risk modelling data with the Insurance Council of Australia.**
- 7. Prepare to 'scale up' capability during major bushfire events with senior representatives (including BoM staff) in the SEC 24/7, ensure adequate facilities for IMTs, base camps (e.g. Humanihuts) and recovery centres. Consider the resource implications of providing firefighters to interstate operations.**
- 8. Engage with the Australian Defence Force (ADF) once or twice a year to understand the capabilities that could potentially be deployed. Educate IMTs about how to deploy ADF assistance effectively and develop a streamlined 'call out' procedure.**
- 9. Invest in fireground leadership and incident management training for CFS, SES and MFS personnel to improve safety on the fireground. Invest in greater technological interoperability such as AVL, Thermal Imagery, Burnover Protection Systems (BOPS), lightning tracking and appropriate vehicle fleets for bushfire conditions including at the peri-urban interface.**

*Response:* The LGFSG is supportive of this recommendation and ideally this training would be made available to all agencies that participate in incident management. The AVL technology solutions should have the capacity to be utilised by support agencies on the fire ground, such as local government heavy plant to ensure the safety of all workers on the fireground.

**10. Incorporate Farm Firefighting Units (FFUs) into the Australasian Inter Service Incident Management System (AIIIMS) so that IMTs are aware of their presence on the fireground and their welfare and risks are understood.**

**11. Develop and practice procedures for the CFS, DEW and local governments to access and deploy heavy plant and machinery for fuel reduction operations both before and during bushfires.**

*Response:* The LGA supports this recommendation. The LGFSG has an existing Joint Operating Guideline (JOG) with the CFS that gives guidance on resource sharing, minimum training requirements, communications and coordination of local government resources on a fireground. This JOG includes cost recovery consideration however the LGFSG is supportive of further work on the JOG to ensure this recommendation is implemented by LGFSG.

The Keelty Review notes that in most locations, outside of the local government i-Responda program, there are limited preplanned agreements covering access to plant and equipment such as bulldozers to clear fire breaks.

The Keelty Review notes that it would be beneficial for the CFS to have clear agreements (including pre-agreed pricing) with local councils, utilities, landowners and contractors establishing equipment standards and procedures to use such equipment.

The Keelty Review notes that this type of plant and equipment could be placed on 'stand-by' or pre-deployed on forecast Severe, Extreme, or Catastrophic fire weather days. These types of heavy plant and machinery are both expensive to own and operate and the owners need to have their machinery operating at capacity as much as possible. These factors will need to be considered in any pre-planned activations for their use.

- 12. Review the use of aviation assets including facilities to operate them given the increased pressure from extended fire seasons on northern and southern hemisphere resources. Review line scanning capability with a view to providing real time data to the IMTs on where fires are burning using aviation assets as an intelligence tool rather than just a fire suppression capability.**
- 13. Better coordinate public information and warnings including evacuation plans and provide a single source of information about, the location and direction of fires, how and when to use *Safer Places, Places of Last Resort*, relief and recovery centres and directed evacuations.**

*Response:* The LGA agrees that the Fire Prevention Strategic Alliance requires greater strategic direction, but would have appreciated being consulted in a review.

The Keilty Review notes that SAPOL has an effective program, Operation NOMAD, aimed to help reduce deliberate or recklessly caused fires. The Fire Prevention Strategic Alliance comprises key agencies aimed at overseeing Operation NOMAD. SAPOL undertook a review of Operation NOMAD in 2019.

The LGA has a representative on the Alliance, which was not consulted during the review.

- 14. Clarify business continuity and restoration of critical infrastructure in the planning and response phases to facilitate water replenishment, fireground remediation and access to businesses (including farming properties).**

*Response:* The LGFSG would support greater clarification on the responsibilities and costs associated with water replenishment and fireground remediation, this would assist LG and the community to better plan for the restoration of activities in a timely manner during bushfire to avoid delays on action. These guidelines need to be consistent across the state avoiding local arrangements that can vary from area to area.

- 15. Collate data and research the impact of bushfires upon communities, firefighters and animals (both native and domestic) to identify appropriate medium and long-term welfare and support requirements.**



## The Keelty Review

### Common Issues (noted from the Keelty Review)

#### *Extreme Weather*

Expert opinion suggests that the weather conditions over the 2019/2020 bushfire season were so extreme that no level of hazard reduction would have prevented the fires.

#### *Overnight conditions did not provide the usual respite*

Some of the worst fire conditions were experienced at night, contrary to normal fire conditions.

#### *24-hour SEC decision-making*

With unprecedented conditions bringing no relief overnight, the usual strategy of having lower level staff in the SEC at night hampered its operations.

#### *Review recommendations not implemented*

South Australia has had 15 fire reviews since 1983 and many of the recommendations – particularly of later reviews – have not been implemented as expected.

*Response:* This is a matter of concern to the LGA which has made submissions to many of these reviews and whose staff and communities are regularly threatened through severe fires. Through its representation on the State Emergency Management Committee and associated committees, the LGA can pursue implementation of the recommendations of these inquiries.

#### *SAFECOM mission-creep*

The Keelty Review noted concerns about SAFECOM overstepping its legislated role and function.

#### *SAFECOM Board conventions*

Unlike other board conventions, the SAFECOM Chief Executive also chairs the SAFECOM Board, raising questions about why this arrangement is in place and whether it delivers the best outcomes for Emergency Services agencies.

#### *State emergency planning arrangements*

The Review observed that the state emergency planning framework is effective if it is followed and agencies do not improvise or cut corners, but it is important that people fulfil the roles outlined in the *Emergency Management Act 2004*.



*Response:* This recommendation is consistent with the LGA Submission Recommendation 3:

*That the State Government undertakes activities to develop a broader understanding of the roles and responsibilities of key agencies under the arrangements of the State Emergency Management Plan.*

The LGA has also been proactively training council staff on state emergency management arrangements through i-Responda, and assisting councils with emergency management planning aligned with the state arrangements via its Council Ready program.