



Fire Protection
Association Australia
Life. Property. Environment.

ABN 30 005 366 576

Building 2, 31-47 Joseph Street
Blackburn North Victoria 3130
PO Box 1049, Box Hill VIC 3128

T +61 3 8892 3131 F +61 3 8892 3132 E fpaa@fpaa.com.au

www.fpaa.com.au

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To: Mr Dave Owens APM,
Professor Mary O'Kane AC

Submission to the NSW Independent Bushfire Inquiry

Fire Protection Association Australia (**FPA Australia**) is the national peak body for fire safety that provides information, services and education to the fire protection industry and the community. We are a not-for-profit organisation and central to our vision is a focus on advocacy in order to influence change and deliver improved fire and life safety outcomes for the community.

Amongst the many activities we are involved in, we administer and operate an accreditation scheme for professionals involved in the Bushfire Planning and Design (**BPAD**) sector. This is known as the BPAD Accreditation Scheme and those accredited through the scheme are recognised by the New South Wales Rural Fire Service (**RFS**) as being "suitably qualified" consultants in bushfire risk assessment.

FPA Australia supports the establishment of the NSW Independent Bushfire Inquiry and congratulates the NSW Government and the RFS for their national leadership in respect to bushfire protection. New South Wales bushfire protection regulation, policy and guidelines are viewed as the benchmark across Australia, and are increasingly being replicated by various other governments.

Notwithstanding the current situation, FPA Australia considers that areas of improvement should be implemented to enhance the professionalism of the bushfire protection industry in the state; enable better and stronger recovery for the 2019-2020 bushfire season and future events; create more efficient planning and building system; and increase overall community resilience.

The suite of issues and recommendations provided in this submission represent a holistic approach to improving bushfire safety for residents and businesses that builds on the existing framework. We encourage the Inquiry to seriously consider the relatively straightforward recommendations detailed in this submission.

It is our considered view that the recent bushfire season revealed many areas for improvement. We consider that the community's appetite for improving bushfire protection and compliance is high and therefore make this submission to strengthen planning and building systems and improve bushfire protection for the future.

1. Importance of using appropriately qualified professionals to assess bushfire risk.

FPA Australia considers that to fully benefit from the existing bushfire planning framework in NSW, it is critical that bushfire assessment and the preparation of reports to demonstrate compliance with the planning framework must only be performed by competent individuals with appropriate skills and knowledge in bushfire planning and design. Such an approach is consistent with the State Government's broader planning and building reforms that set out to establish Competent Fire Safety Practitioners.

Under the current regulatory model, an uninsured person with no requirement to demonstrate skills and knowledge in bushfire behaviour, bushfire assessment or the planning system is able to prepare a bushfire assessment to accompany a planning application. Given the complexity of bushfire assessment and the risk associated with incorrect assessment, the Association considers that reforms are necessary to prevent this from occurring in the future.

Those same legislative instruments allow local government to perform the same role as a suitably qualified consultant without the need to demonstrate competency or to be recognised by the RFS. We understand that some local governments are using this as an opportunity to provide a "fee for service" consultancy, which directly competes with those that have sought recognition of competency from the RFS. This ultimately weakens the development system and exposes local government to significant and unnecessary corporate risk. In addition it does not necessarily align with the competitive neutrality components of the *Intergovernmental Agreement on Competition and Productivity Reforms* which the State Government has agreed to.

However more importantly this has the potential to lead to the increased likelihood of incorrect bushfire risk assessment. This then has the direct result of leading to either unnecessary bushfire risk or unnecessary development costs.

The concept of requiring competency is not unfamiliar to the development system with many Local Environmental Plans referencing reports from those that are "suitably qualified" in areas of stormwater management, geotechnical issues and effluent disposal (just to name a few examples).

FPA Australia's Bushfire Planning and Design Accreditation Scheme is now seen by most jurisdictions as the preferred model for ensuring professional assessment of bushfire risk. The assessment of bushfire hazard and bushfire risk is a difficult and complex process that should be restricted to individuals who possess a detailed knowledge of amongst other things, vegetation structures, fire dynamics and the performance of building materials exposed to bushfire.

Traditionally the acknowledgement of bushfire professionals with appropriate academic qualifications has been virtually non-existent. This is despite the horrific impact that bushfires have on Australian communities on a regular basis.

The Association is acutely aware of numerous examples where the assessment of bushfire hazard has been inappropriately determined by untrained people resulting in the incorrect establishment of bushfire mitigation measures with the potential to put lives and property at a heightened level of exposure.

The complexity and variability of the factors that are used to determine bushfire risk requires a consultant to draw upon many years of experience and knowledge of fire behaviour and hazard identification and assessment. It is not something that can or should be allowed to be undertaken by untrained people using simplified assessment tools. Doing so could be similar to allowing an untrained or unqualified person to undertake electrical work.

Recommendation 1

Support the requirement that all individuals working in the bushfire planning, development and construction field are appropriately qualified, experienced and insured to the degree necessary.

2. Enhanced reliance on reports / certificates provided by qualified bushfire consultants.

The current planning approval system maintains a de facto approval authority role for the Rural Fire Service, an emergency services organisation for a variety of developments of bushfire prone land in NSW. These arrangements can lead to uncertainty for the land owner as well as causing delays and duplication of assessments. The current arrangements are based on a legacy system that existed prior to there being a nationally recognised scheme for the accreditation of practitioners who have the qualifications and skills relevant to the assessment of development on bushfire prone land.

FPA Australia submits that efficiencies in the development approval process could potentially be realised by redirecting some of the Rural Fire Services resources from an application focussed role to a policy development and audit role. The Association submits that the RFS' main role in relation to planning matters should be to produce standards, codes and other material to determine the appropriateness of development and the requirement for certain mitigation measures to address bushfire risk, whilst also having a role to audit the work undertaken by qualified consultants.

FPA Australia acknowledges that the current legislative arrangements recognise a limited role for qualified consultants; however we submit that these provisions need to be both enhanced (discussed later) and implemented appropriately.

The provisions in Section 4.14 (b) of the Environmental Planning and Assessment Act 1979 (**EP&A Act**) allow for consent authorities to grant development consent (subject to other non-bushfire provision being satisfied) where a certificate / report has been prepared by a qualified consultant and the development conforms to the specifications and requirements of *Planning for Bushfire Protection*. These measures should significantly streamline the development approval for low risk sites, however the application of these provisions is not consistent across the State.

FPA Australia believes that some consent authorities act cautiously when accepting certificates / reports prepared by appropriately qualified consultants. The Association believes that this may be the result of a lack of investment in the skills and knowledge of council staff in relation to matters associated with bushfire assessment. The outcome of this practice is that these reports are then referred to the RFS.

The Association is aware of numerous instances where the RFS essentially conducts its own parallel assessment and determination of bushfire risk, rather than undertake a review of the report prepared by the suitably qualified consultant. The Association believes that there are opportunities to reduce this form of "double handling" and submits that the role of the RFS should be to ensure that the report / certificate prepared by the suitably qualified consultant adequately justifies the proposed mitigation measures without the need to conduct a parallel assessment.

Furthermore, the Association considers that the arrangements that exist under Section 4.14(1) should be extended to subdivisions that conform with Planning for Bushfire Protection, thus avoiding the need for a consent authority to refer subdivision applications to the RFS.

Recommendation 2

1. Provide a requirement for mandatory accreditation of bushfire practitioners working in the bushfire planning and design space
2. Provide a requirement for mandatory education or accreditation of the regulators and decision makers in the bushfire planning and design space; and
3. Formally recognise FPA Australia as an Accrediting Body for bushfire practitioners in New South Wales

3. Regulatory amendments to further recognise accredited practitioners and strengthen the implementation of Planning for Bush Fire Protection 2019

In February 2019, FPA Australia made a submission to the NSW Department of Planning and Environment as part of an invitation to comment on proposed regulatory reforms to recognise the new version of Planning for Bush Fire Protection 2019. The submission detailed key amendments to strengthen the implementation of Planning for Bush Fire Protection 2019 (**PBP 2019**). The aim of the amendments was twofold, one outcome was to cement the need to engage professional bushfire consultants to assess bushfire risk throughout all aspects of the building and planning system; and the second outcome sought to remove ambiguity and provide clarity in regards to compliance matters. The Association has not received any communication from government regarding our submission and the matters brought to their attention remain outstanding. Details of the original submission are provided below.

Whilst the current regulatory system has limited controls over the assessment of bushfire risk by competent individuals at low risk sites, such as where the State Environmental Policy Exempt and Complying Development Codes (**E&CD Codes**) apply. The same approach is not available for high risk sites where Performance Solutions are often used or for sites that involve vulnerable developments such as Special Fire Protection Purpose developments.

It is our view that irrespective of whether a person works for a local government or a private company, that person needs to have recognised competency in bush fire risk assessment. Accordingly, the Association is calling for a number of changes to be made to the Environmental Planning and Assessment Act 1979 (**EP&A Act**) and the E&CD Codes to facilitate this.

Recommendations 2, 3 and 4 below seek to improve bushfire outcomes by requiring the assessment of bushfire risk and the development of planning and construction responses to be undertaken by suitably qualified individuals. The recommendations also further support the enhancement of the current co-regulatory framework which provides opportunities to improve the planning and construction approval processes leading to a reduction in costs for the community.

Whilst the Association is cognisant that the number of suitably qualified consultants currently recognised by the RFS may not be sufficient to perform all bushfire risk assessment in NSW immediately, we consider that introducing a regulatory transitional period, coupled with an improved educational pathway over a reasonable timeframe would be the most effective approach.

Recommendation 3A

Amend Section 4.14 of the Environmental Planning and Assessment Act to require a certificate from a suitably qualified consultant and reinforce the need for a report to be produced to accompany development applications

4.14 Consultation and development consent—certain bush fire prone land

(1) Development consent cannot be granted for the carrying out of development for any purpose (other than a subdivision of land that could lawfully be used for residential or rural residential purposes or development for a special fire protection purpose) on bush fire prone land (being land for the time being recorded as bush fire prone land on a relevant map certified under section 10.3 (2)) unless the consent authority:

(a) is satisfied that the development conforms to the specifications and requirements of the version (as prescribed by the regulations) of the document entitled *Planning for Bush Fire Protection* prepared by the NSW Rural Fire Service in co-operation with the Department (or, if another document is prescribed by the regulations for the purposes of this paragraph, that document) that are relevant to the development (***the relevant specifications and requirements***), **and**

(b) has been provided with a certificate **and a report** by a person who is recognised by the NSW Rural Fire Service as a qualified consultant in bush fire risk assessment stating that the development conforms to the relevant specifications and requirements.

(c) Prior to 1 January 2021, the consent authority may consent to the development without being provided with a certificate and report by a person who is recognised by the NSW Rural Fire Service, if the consent authority demonstrates to the satisfaction of the NSW Rural Fire Service that they have appropriate skills and competencies to undertake bush fire risk assessments.

(1A) If the consent authority is satisfied that the development does not conform to the relevant specifications and requirements, the consent authority may, despite subsection (1), grant consent to the carrying out of the development but only if it has consulted with the Commissioner of the NSW Rural Fire Service concerning measures to be taken with respect to the development to protect persons, property and the environment from danger that may arise from a bush fire; and

has been provided with a report by a person who is recognised by the NSW Rural Fire Service as a qualified consultant in bush fire risk assessment demonstrating that the development conforms to the relevant Performance Criteria of the document entitled Planning for Bush Fire Protection prepared by the NSW Rural Fire Service in co-operation with the Department (or, if another document is prescribed by the regulations for the purposes of this paragraph, that document) that are relevant to the development.

(1B) This section does not apply to State significant development.

(1C) The regulations may exclude development from the application of this section subject to compliance with any requirements of the regulations. The regulations may (without limiting the requirements that may be made):

(a) require the issue of a certificate by the Commissioner of the NSW Rural Fire Service or other qualified person in relation to the bush fire risk of the land concerned, and

(b) authorise the payment of a fee for the issue of any such certificate.

(2) In this section:

special fire protection purpose has the same meaning as it has in section 100B of the [Rural Fires Act 1997](#).

Recommendation 3B

FPA Australia recognises that amending Section 4.14 of the Act to achieve the desired intent that only suitably qualified and competent individuals should prepare bush fire risk assessments may not be possible at this time. Therefore we propose an alternative to achieve a similar outcome by introducing a new regulation as below.

New Regulation 273B Environmental Planning and Assessment Regulation 2000

273B Bush Fire Risk Assessments

- (1) Pursuant to section 4.14(1) and 4.14(1A) of the Act, prior to granting consent for the carrying out of development on bush fire prone land the consent authority must be provided with a certificate and a report prepared by a person who is recognised by the NSW Rural Fire Service as a qualified consultant in bush fire risk assessment; and
- (2) Subclause 1 does not apply prior to 1 January 2021

Recommendation 3C

Amend various State Environmental Planning Policies that permit the determination of a bushfire attack level to be undertaken by the council, by either excluding council completely from the process or requiring a council employee to demonstrate competency in bush fire risk assessment.

State Environmental Policy (Exempt and Complying Development Codes) 2008

Amend clause 3A.37 (3) as follows:

Option 1:

- (3) A standard specified in subclause (2) (b) is satisfied if one of the following certifies that the development is not in bush fire attack level-40 (BAL-40) or the flame zone (BAL-FZ):
 - (a) (Repealed)
 - (b) a person who is recognised by the NSW Rural Fire Service as a suitably qualified consultant in bush fire risk assessment, or
 - (c) (Repealed).

Option 2:

- (3) A standard specified in subclause (2) (b) is satisfied if one of the following certifies that the development is not in bush fire attack level-40 (BAL-40) or the flame zone (BAL-FZ):
 - (a) (Repealed)
 - (b) a person who is recognised by the NSW Rural Fire Service as a suitably qualified consultant in bush fire risk assessment, or
 - (c) an employee of the council who demonstrates to the satisfaction of the NSW Rural Fire Service that they have appropriate skills and competencies to undertake bush fire risk assessments.

4. Auditing of Qualified Bushfire Consultants

Whilst FPA Australia supports an enhancement of the role of qualified bushfire consultants through an extension of their responsibilities to support a more streamlined development application system; we are acutely aware that such an enhancement should be supported by a robust auditing system to review the work undertaken by qualified bushfire consultants.

The purpose of the audit is to ensure the integrity of the BPAD Scheme is protected. It also allows the Association to demonstrate to Regulatory Authorities, Fire Authorities and key stakeholders that the BPAD Scheme has in place systems that meet their expectations. This includes an assurance that the ongoing delivery of the work completed by Accredited Practitioners is conducted professionally.

FPA Australia considers that where the regulatory requirements allow for the recognition of qualified consultants in bush fire risk assessment that the Rural Fire Service or other Regulatory Authority should work with the Association to develop guidelines, requirements and expectations for the auditing of such persons. FPA Australia would also welcome a requirement for the Rural Fire Service or other Regulatory Authority to conduct a holistic audit of the operation of the BPAD Scheme on a regular basis and to be adequately resourced to conduct such audit.

FPA Australia's BPAD Accreditation Scheme runs a successful audit process of BPAD practitioners in Western Australia. The Association is recognised by the Western Australian Government as an Accrediting Body, which requires the Accredited Practitioners to be audited at least once every five years. The audit is conducted by FPA Australia with the cooperation of the relevant authorities. Audit process enables the Association monitor quality of the work produced by practitioners, identify the systematic mistakes and address them accordingly.

Such an auditing system can be easily implemented in NSW as well, however, this will require a formal recognition of BPAD practitioners to enable the Association to take firmer actions against practitioners if required.

Recommendation 4

Provide a requirement for mandatory audit of accredited practitioners by the Association with the assistance of relevant agencies

5. Eliminate use of single dwelling application kit in bushfire prone area

The RFS currently provides a document known as the Single Dwelling Application Kit. According to the RFS, the document has been designed to support and provide an applicant with a process to follow that will assist them to meet the current requirements for bush fire protection.

The document is intended to be used by untrained and unqualified individuals to assess bushfire risk and is targeted at owners, builders, architects, building designers and draftspersons, who do not have the requisite knowledge of bush fire risk assessment, bush fire behaviour and an understanding of the intent and application behind regulatory requirements for bush fire protection.

It is understood that the intent of this document when originally created was to assist the community understand bushfire planning requirements and reduce costs associated with submitting planning applications. However anecdotal evidence suggests that more often than not, an inaccurate assessment of bush fire risk is performed, leading to a resultant increase in the vulnerability of the development to bushfire.

In limited instances, the mistakes or inaccuracies made in such applications are addressed by development officers, planners or building surveyors in the local council. However, in many instances local council employees are also lacking in sufficient bush fire risk assessment knowledge and skills, which results in development that underestimates or overestimates (more rarely) bush fire risks to the development. Such practices can potentially result in loss of lives and significant damage not only to the particular development, but to the wider community.

The Association is concerned that continued use of this document perpetuates problems that amplify bushfire risks to the community. There is an array of evidence that consistently shows that bushfire risk is underestimated when the Kit is used, however this is not addressed as part of the planning approval process. BPAD practitioners often undertake bushfire assessment of sites that abut those developed using the Single Dwelling Application Kit and find issues of gross negligence in the assessment of bushfire risk and the subsequent approval and development of exposed dwellings.

The usefulness and suitability of the Single Dwelling Application Kit is no longer appropriate given there are options to utilise the skills of a professionally trained bushfire practitioner and the Association calls for the kit to be withdrawn from use. To do otherwise will continue to allow non-qualified and non-competent individuals to assess bushfire risk.

Recommendation 5

Immediate withdrawal of the RFS Single Dwelling Application Kit

6. Establishment of Nationally Recognised Vocational Bushfire Protection Qualifications

The bushfire planning and construction sector is made up of a range of individuals spanning multiple professions including bushfire consultants, ecologists, town planners, fire service personnel, builders and developers and building certifiers, to name a few.

The limited educational pathways available to individuals in New South Wales who operate in this field consist of a five day short course delivered by one institution once per year, and a post graduate qualification delivered by a single institution.

Many practitioners in the bushfire protection industry have raised concerns about the adequacy and suitability of these courses. This feedback has led to a recommendation that the development of a vocational pathway providing foundation skills and knowledge in the bushfire planning and construction fields would significantly benefit the broader bushfire protection industry.

The currently available courses fall short in several areas. The short courses do not provide sufficient depth of understanding and application to ensure participants gain a credible level of skills and knowledge. Whilst post graduate courses are set at very high academic level, that necessarily restricts their ability to focus on foundation skills and may also be a barrier to entry for certain individuals who generally require an undergraduate degree in an associated field to meet the enrolment requirements.

The establishment of a vocational bushfire qualification would serve two main purposes:

1. Provide a more appropriate learning experience for associated professionals who work indirectly in the bushfire protection area, such as:
 - a. Local Government employees
 - b. Town Planners
 - c. RFS Community Safety Staff; and
2. Establish a career pathway for those individuals interested in becoming accredited as bushfire consultants.

A vocational qualification for new entrants supports their ability to apply skills and knowledge in a practical sense, rather than through a purely academic learning experience.

Implementation of a vocational qualification would support an expansion of the capacity of the bushfire protection industry to undertake many of the recommended activities detailed in this submission.

Furthermore, a vocational pathway would create a career pathway and permit graduates to undertake certain lower risk activities in the bushfire planning and construction field under the guidance and mentoring of an accredited bushfire consultant. This model would increase the capacity of the industry to meet community needs whilst maintaining the integrity of the accreditation scheme by requiring this work to be authorised by an accredited practitioner.

The Association considers that the development of a nationally recognised vocational qualification such as a Diploma or Advanced Diploma of Bushfire Protection should be recommended and will greatly assist with the implementation of bushfire planning requirements in New South Wales.

Such a qualification could include the following competencies:

- Knowledge of the factors affecting bushfire behaviour and the models used to quantify bushfire behaviour
- Knowledge of vegetation and its influence on determining bushfire attack levels.
- The ability to assess bushfire threat and determine a Bushfire Attack Level
- Knowledge of the legislative and policy framework that governs development on land subject to bushfire impact.
- Knowledge of the mechanisms for bushfire attack and an understanding of the construction requirements that can be applied to a building appropriate to the BAL to mitigate bushfire attack for both new and existing developments.

- An understanding of the measures that can be used to support firefighting activities during bushfires when planning developments in the rural urban interface.
- Knowledge of conceptual planning issues and constraints for bushfire prone areas including such things as appropriate siting and landscaping and recognising potential impacts of a bushfire.
- Design developments including subdivisions, new buildings or modifications to existing buildings in bushfire prone areas, aiming to minimise the risk to future developments and their occupants from bushfire and facilitate safe response to bushfires by emergency services.
- Prepare reports, plans and diagrams for subdivisions, new buildings or modifications to existing buildings in bushfire prone areas that respond to the bushfire risk and meet the jurisdictional land use planning and construction requirements related to bushfire.
- Obtaining and interpreting relevant maps and data, and applying that data to create plans and reports pertaining to the development
- Provide advice to property owners to assist with improving resilience to bushfire

Recommendation 6

Establish a nationally recognised vocational bushfire protection qualification to meet the needs of the broader bushfire protection industry

7. Provision of guidance notes and support resources

Over the course of the past several years, FPA Australia has been actively providing support in relation to the application and assessment of bushfire planning in New South Wales to a very broad range of stakeholders. Our engagement with government and other stakeholders in New South Wales and our exposure to bushfire planning at a national level provides us with the exposure and expertise to assist with the provision of support and guidance, however we are not necessarily funded to provide this support and have only been able to commit limited resources to address matters.

The Association believes that a large number of the concerns raised in regards to the application of bushfire planning in New South Wales can be resolved through the development of guidance notes and support resources. The Association welcomes the opportunity to assist with the development of these resources in conjunction with bushfire experts from around Australia, however to do this would require a partnership arrangement between fire agencies and private industry.

Recommendation 7

Consider funding initiatives to allow for the development of guidance notes and resources to be created by industry in cooperation with government to address the many interpretation and practice issues identified in this submission and raised by accredited practitioners.

8. Reconcile ongoing conflicts between biodiversity protection and bushfire safety outcomes

Reconciling conflicts between bushfire protection and biodiversity protection is an area of concern often identified by bushfire practitioners. In particular application of the Biodiversity Offset Scheme (BOS) thresholds as prescribed in the NSW Biodiversity Conservation Act 2016 (BC Act).

One of the key concerns is the application of Vegetation Offset requirements regarding 'minimising' impact, and the (apparent) resultant increase of bushfire risk.

This unintended outcome is the result of trying to accommodate a development proposal without exceeding the given native vegetation clearing threshold, which triggers compliance with the Biodiversity Offset Scheme (BOS).

Once the BOS is triggered, a Biodiversity Development Assessment Report (BDAR) is required to be compiled. The BDAR development is expensive, and it will trigger the requirement to offset the clearing by generating ecosystem credits and species credits. These credits need to be purchased by the proponent if the project is approved and it can be a rather costly process (depending on the amount and type of offset credits generated). As a result, proponents elect to "clear" less land and take the path of least resistance (and cost). This results in an increase in bushfire risk that may or may not be disproportionate to possible loss of biodiversity value.

Whilst all efforts should be made to accommodate a proposal within the existing cleared areas and not to disturb native vegetation, this is often not avoidable. Therefore, there is a need to develop a coordination between the consultants undertaking the biodiversity and bushfire assessments.

Our recommendation is for the NSW Government to further investigate this issue and address the relevant authorities directly. Our expert members can provide further details upon request.

Recommendation 8

Consider further investigation into the ongoing conflict between bushfire safety outcomes and biodiversity protection

9. Requirement for ongoing building maintenance and education of home owners

Most of the key efforts in bushfire protection are traditionally focused on the development stage. The post-development check and ongoing maintenance of the development tend to be overlooked. This, unfortunately, can result in poor construction practice; improper use of spaces resulting in increased bushfire risks (e.g. storage of flammable material under the deck); or lack of maintenance of APZ to the intended standard.

Failure to maintain a building and the surrounding site in accordance with approved plans, undermines the level of protection afforded a building and increases the likelihood that the building and its occupants will have an increased vulnerability to bushfire that exceeds the standards that were used for the original approval.

The Association considers that implementation of a regime for undertaking post-development certification to ensure that a development complies with the development approval both at time of completion and in perpetuity is a significant improvement that will increase community resilience.

The Association considers that a three phase process should be implemented. Phase one would require a detailed plan to be created as part of the development approval process, that identifies all measures required to be maintained in perpetuity to meet the expected level of bushfire risk.

Phase two would require a certificate / report to be prepared by a suitably qualified bushfire consultant to certify compliance with the approved development at time of completion of the development, prior to occupation of any building or the release of titles for subdivision.

Phase three is to implement a system that, to the extent necessary, mirrors the provisions of an assessment of an Essential Fire Safety Measure pursuant to the EP&A Act. FPA Australia considers that the requirement of an approved development to implement and maintain bushfire protection measures, should be treated in the same way as a fire protection system installed in a building. The latter measures require an annual assessment of performance to be assessed by a person known as a Competent Fire Safety Practitioner.

The ongoing maintenance of the bushfire protection measures for a development is critical to ensuring that the approved development remains fit for purpose and significantly enhances the likelihood of the building surviving the passage of a bushfire. The above three phase approach would support implementation of this principle.

Recommendation 9

1. Implement a requirement for a plan detailing bushfire protection measures to be prepared and submitted as part of the approval process.
2. Establish a mechanism for a post development compliance certificate for bushfire related conditions; and
3. Establish a mechanism that requires for the periodic assessment and certification of the performance of installed bushfire protection measures for all approved development.

Conclusion

We wish to thank the NSW Government for the opportunity to provide a submission to the NSW Independent Bushfire Inquiry and we hope our comments and recommendations will help shape legislation and outcomes that will improve bushfire safety for all people in NSW.

If you have any further questions regarding this submission, please contact me by phone on [REDACTED] or [REDACTED] or by email: [REDACTED].

Yours sincerely

[REDACTED]

Chris Wyborn
General Manager Training, Accreditation and Bushfire Services
FPA Australia