

From: [NSW Government](#)
To: [Flood Inquiry](#)
Subject: Floods Inquiry
Date: Friday, 20 May 2022 4:47:24 PM
Attachments: [Independent Bushfire Group submission to the NSW 2022 Flood Inquiry.pdf](#)

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Submission details

I am making this submission as	A member of the general public
Submission type	I am submitting on behalf of my organisation
Organisation making the submission (if applicable)	Independent Bushfire Group
Your position in the organisation (if applicable)	Secretary
Consent to make submission public	I give my consent for this submission to be made public

Share your experience or tell your story

Terms of Reference (optional)

The Inquiry welcomes submissions that address the particular matters identified in its [Terms of Reference](#)

Supporting documents or images

Attach files

- [Independent Bushfire Group submission to the NSW 2022 Flood Inquiry.pdf](#)
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Submission to the NSW 2022 Flood Inquiry: Lessons from the NSW Bushfire Inquiry (2020)

This submission provides recommendations for how findings from the current inquiry could be baked into Government and community actions for flood planning, preparation response and recovery.

The current inquiry comes two years after the NSW Bushfire Inquiry. The Independent Bushfire Group observed how the NSW Bushfire Inquiry has been implemented and makes two recommendations for the NSW 2022 Flood Inquiry to consider. Our analysis and recommendations are deliberately brief to highlight those we see as critical for delivery of improvements being sought by Government through the NSW 2022 Flood Inquiry and its Terms of Reference.

The **Independent Bushfire Group** (IBG) was formed in NSW after the Black Summer fires of 2019-2020. That disaster showed that change was needed in how bushfires are managed in our worsening fire climate. The IBG is a voluntary group of non-aligned bushfire practitioners, fire managers, land managers, fire researchers and ecologists with 450 years of collective experience across a range of landscapes. The IBG advocates for better emergency management with a focus on practical firefighting, science and evidence-based practices. The [IBG website](#) contains links to our people, reports, submissions, and media articles.

1. Enable a strategic framework for improved flood planning and management and an accountability mechanism for findings of the current inquiry.

Recommendation 1: That, in order to ensure a comprehensive and strategic approach to flood planning and management, that Government establish a new NSW flood plan. The plan would capture the vision for change and findings from the current inquiry report and other reviews. The plan would be updated annually, informed by ongoing analysis of the 2022 event and After Action Reviews from subsequent events. The government would make quarterly progress reports to parliament. A NSW flood plan would contain a plan of action that is 1) measurable, 2) accountable, 3) transparent, 4) updated as new learnings arise and 5) independently audited.

What follows summarises those aspects of the Bushfire Inquiry we see as relevant to the current inquiry, and informs our recommendations to this inquiry.

The NSW Bushfire Inquiry report was a significant step forward that, if its documented intentions were properly implemented, would improve bushfire management in NSW. Like the current inquiry, the Bushfire Inquiry addressed Terms of Reference established by government and drew input from public submissions, expert and agency advice. Like the current inquiry, the Bushfire Inquiry undertook this work over several months and reported back to government shortly afterward.

The Inquiry had a huge task to address many complex issues in a short timeframe. This meant there was little opportunity within the Inquiry for dialogue to cross-examine issues and inputs, nor to compel truthfulness (as in a Royal Commission). Further, the Inquiry lacked specific fire expertise, hence it sought advice from government agencies and commissioned input from scientists.

The Bushfire Inquiry report was presented in three sections: an executive summary that expressed a vision for improved fire management; issues based discussion and analysis; and 76 recommendations drawn from the second section. Being derived from aspects of the discussion section, the recommendations left gaps for what would be needed to fully achieve the vision articulated in the first section.

At the time the Inquiry report was written, the only detailed published analyses of specific fire events were the 8 case studies published by the IBG. That these analyses were ground-breaking, yet produced by volunteers, should be of concern to policy makers, especially given the paucity of rigorous data in many aspects of bushfire management. Consequently, there were significant rigor gaps in information available to the inquiry.

In their executive summary, the Bushfire Inquiry recognised that examination of the 2019-20 bush fire season should continue beyond the inquiry but made no recommendations for scope or direction of this work nor how this knowledge would be integrated into systematic improvement.

The Bushfire Inquiry report provided a good overview of the fires and causes, of their extent and severity, but implicitly assumed control efforts were largely appropriate. No analysis supported this assumption despite many submissions indicating that some actions contributed to fire spread and damage and deserved closer examination. Conversely, no recommendations were made to reinforce current practice where the Inquiry was satisfied with existing arrangements.

Community was mentioned in the report 483 times but there were no recommendations for agencies partnering or engaging with communities or for community bushfire planning. Stronger recommendations could have been made on how communities can work together to increase their resilience. Similarly, despite coverage in the executive summary, only partial recommendations were made on how research into fire events should be progressed and how control strategies could be improved to limit fire spread.

The Bushfire Inquiry understood the need for timely and transparent implementation of its report. In its first recommendation, the Inquiry called for an accountability mechanism to be established. Part of this recommendation was legislated (as quarterly reports to parliament on Inquiry recommendations) through an opposition amendment to a bushfire bill that was tangential to the Bushfire Inquiry findings. Notably, the second and more expansive part of the first recommendation, *to track implementation of recommendations from bush fire-related reviews and inquiries and consider expanding this to other policy areas*, to date has not been implemented.

The absence of a strategic framework has limited reporting on actions specific to the 76 recommendations with no assessment of how successful these actions have been in delivering on the vision set out in the Inquiry report.

Best practice requires that government creates a NSW flood plan around the Flood Inquiry report and its recommendations. Such a strategy would draw from other reviews and the [National Natural Disaster Arrangements Royal Commission report](#).

Independent review

Recommendation 2: That the government establish a new Inspector General for Emergency Services to provide oversight for emergency management in NSW. The new Inspector General would be independent, take a holistic approach and report direct to parliament. The Inspector General would oversee continuous improvement

in all emergency functions of NSW lead response agencies, including State Emergency Service, Rural Fire Service and Fire and Rescue.

Benefits generated by independent accountability are well understood. Despite the multi-billion-dollar and rapidly escalating cost to government of disaster planning, response and recovery and the similar escalating cost and disruption to communities, there is no review and accountability mechanism for emergency management in NSW. Its fair to say that no NSW emergency response agency yet has an effective, comprehensive and independent lessons management system in place.

The 2020 Royal Commission into National Natural Disaster Arrangements looked closely at independent review mechanisms for bushfire and other disasters, and recommended that every state establish such a mechanism to “promote continuous improvement and best practice in natural disaster arrangements”. The Royal Commission found that independent accountability was important to “encourage the best use of resources, and best possible outcomes for our communities”.

The Royal Commission found the Inspector Generals for Emergency Management in Victoria and Queensland are doing valuable work.

Objective and independent monitoring will provide safety benefits for combat agency volunteers and ensure their efforts are effectively used on the best emergency management strategies.

Combat agency volunteers, staff and the whole community need transparency, so everyone can be confident that emergency combat agencies keep building on past advances for better and less costly results.

In conclusion, we thank you for the opportunity for input and hope that our contribution is useful.

Yours sincerely,

Ian Brown

Secretary Independent Bushfire Group