

# Inquiry into the Impact of Public Land Management Practices on Bushfire in Victoria

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**Submission to the Environment and  
Natural Resources Committee**



PO Box 453  
Mt Waverley Vic 3149

4 Lakeside Drive  
Burwood East Vic 3151

Tel: 03 9886 1141  
Fax: 03 9886 1618  
Email: [vfbv@vfbv.com](mailto:vfbv@vfbv.com)

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## Background

There are approximately 59,000 Country Fire Authority (CFA) volunteers throughout Victoria that make up more than 98% of CFA's workforce. Under the *CFA Act*, the interests of volunteers are represented by the Victorian Rural Fire Brigades Association (VRFBA) and the Victorian Urban Fire Brigades Association (VUFBA). Each of these Associations has two representatives appointed by the Minister for Police and Emergency Services to CFA's governing board. This structure and representation of volunteers has been in existence since the formation of CFA in 1944.

Over the last few decades, the roles and responsibilities of rural and urban fire brigades that were once quite distinct have become more common and integrated. In an endeavour to meet the demands of a fully integrated fire and emergency service that will be a signature of the future CFA, volunteers have recognised the need to modernise and strengthen their representation with key stakeholders.

Volunteer Fire Brigades Victoria (VFBV), with the encouragement and support of CFA, is the organisation in transition that will in the near future be the peak body to represent the views of all CFA volunteers regardless of the nature of their community and associated risks. In the meantime, and pending the final evolution of the single representative body, the VRFBA and the VUFBA have both assigned the responsibility for dealing with strategic issues that impact on all volunteers to Volunteer Fire Brigades Victoria.

Since well before the inception of CFA, volunteer firefighters have been engaged in fire suppression on public land. It is therefore evident that the manner in which public land is managed can have a significant impact on the time that volunteers commit to CFA. This in turn has a flow-on impact to employers, the viability of self-managed enterprises and the balance between work, community obligation and family.

CFA volunteers have proved their worth to the community and the State of Victoria through their efforts over countless years and summer seasons, none more so than the summer just past. However, this contribution is not endless and whilst CFA volunteers expect little in return, they do expect that their concerns will be heard as they strive to maintain the balance between community support and the realities of today's work and family obligations.

CFA volunteers have a vital interest in the management of fire associated with public land. Unplanned fire on public land can, and often does, escalate rapidly to threaten private and community infrastructure and other assets. As these fires grow in size and potential areas of impact extend, so does the requirement for volunteers to deploy to support the responsible agencies and defend communities at risk.

It is in this context and the undeniable contribution that CFA's volunteers make to the well being of the Victorian community, the protection of public assets and the environment, and the substantial savings accrued by Government as a result of this contribution, that VFBV makes this submission and asks to be heard.

## **1. The extent, timing, resourcing and effectiveness of prescribed burning on both crown and freehold land**

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- 1.1 Volunteer Fire Brigades Victoria (VFBV) contends that prescribed burning, where it has been successfully implemented, has been effective in reducing the impact of wildfires across the broader landscape and in reducing the threat to private and public infrastructure in built areas that are largely protected by CFA volunteer fire fighters.
- 1.2 In this context VFBV supports the continuation of prescribed burning as a strategy to:
- reduce the impact of wildfire on the environment;
  - reduce the likelihood of large fire development;
  - provide areas of reduced fuel that form a buffer zone from which to initiate more aggressive containment strategies; and
  - provide enhanced protection adjacent to communities and public assets.
- 1.3 In particular, VFBV emphasises that, in the absence of effective broad acre landscape fuel reduction, the likelihood of more intense and longer duration unplanned wildfires is inevitable. This not only has a devastating impact on the environment and threatened communities, but also requires a more extensive commitment from volunteers to engage in the protection of those communities.
- 1.4 Prescribed burning should be planned on a 10 year “in principle” horizon and implemented on a five year rolling program with appropriate budget flexibility to achieve required outcomes in the event that programs fail to achieve objectives in any particular year. Prescribed burning should be implemented in Victoria based on:
- site and species specific prescriptions that recognise the key factors affecting fire behaviour;
  - priority fuel management zones;
  - affording priority to community and fire fighter safety;
  - reduction in the frequency and extent of wildfires;
  - minimisation of the impact of wildfire on public infrastructure and private assets; and
  - a safer working environment for firefighters.
- 1.5 The Government must ensure that the Department of Sustainability and Environment (DSE) is provided with sufficient resources to achieve its fire prevention and mitigation programs, including prescribed burning, on an annual basis where weather and fuel conditions permit. For example, if conditions are suitable to continue the prescribed burning program beyond a particular annual target, there should be sufficient budget flexibility to allow for project fire fighters to be engaged prior to the normal summer season and retained beyond an arbitrary cut-off date established at the commencement of the fire season. This would then provide a benefit in subsequent years if the window of opportunity is compressed due to

adverse seasonal conditions (i.e. when the autumn break occurs early or conditions remain too dry).

- 1.6 CFA volunteers should be provided with opportunities to participate in prescribed burning programs, particularly where there are immediate benefits to the communities they protect. This will assist volunteers to develop and maintain appropriate competencies that are of benefit to the whole community at times when support to the Department is required in the suppression of wildfires on public or similarly vegetated private land. By the same token, the achievement of any prescribed burn on public land should not be solely dependent on involvement of CFA volunteers as the Department must retain its responsibility to achieve its annual fuel reduction objectives in the absence of this supplementary support.
- 1.7 Prescribed burning in collaboration with CFA volunteers will need to be planned and executed around the availability of volunteers, and DSE must recognise that this approach may incur some additional expenditure. However, VFBV's view is that, in the longer term, the return to the community (and the Government) in times of greater need will far outweigh any additional costs incurred. Local liaison and cooperation between Departmental Officers and CFA Brigades must occur to ensure that both organisations avail themselves of these opportunities and derive benefits from a bipartisan approach.

## **2. The manner in which prescribed burning is conducted, including how applicable codes of practice are employed**

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- 2.1 Prescribed burning should be based on reducing the hazard associated with the excessive accumulation of wildfire fuels on a landscape basis, i.e. across both public and private land. Planning for prescribed burning should be risk-based and treated holistically regardless of land tenure.
- 2.2 Prescribed burning should complement DSE's priorities, including the commitment to an "*aggressive first attack on any new wildfires*" by taking into account site and species-specific fuel characteristics that may, if allowed to accumulate, compromise the ability to initiate first attack successfully.
- 2.3 Prescriptions for prescribed burning should be reviewed to increase the flexibility to achieve the required outcomes under a variety of suitable weather and environmental conditions.
- 2.4 DSE's internal policies should be designed to provide maximum support to staff charged with the responsibility to conduct prescribed burns. This approach must recognise the inherent difficulties associated with conducting prescribed burns and that, in some instances, the execution of the burn may not always go according to plan (e.g. Mogg's Creek, Wilson's Promontory). In principle, asset damage as a result of a drift outside prescription should be eliminated by the implementation of a holistic risk-

based approach to asset protection in the first instance i.e. if the asset could be at risk from a wayward prescribed burn then it would surely be at risk from a wildfire and should therefore be subjected to alternative risk minimisation strategies. The intent should be to minimise employee adoption of a “risk averse” approach to the process rather than one of “risk consciousness”. Employees should be free to act with appropriate responsibility and the knowledge that they will be supported. In essence, a process is required that provides for the decision to implement an approved burn to be made at the lowest possible level with support from the highest possible level.

- 2.5 This would mean that once a burn plan has been developed in accordance with Departmental procedures, ignition would occur under conditions deemed suitable by local employees with particular knowledge of the local environment and without the need for further centralised approval. This would ensure that ignition of a burn occurs under the most suitable conditions and is not unduly delayed to the extent that the “window of opportunity” is lost.
- 2.6 The Department, in conjunction with CFA’s community educators, must strengthen comprehensive community education and engagement programs that emphasise the overall benefits of the Department’s fire management programs and minimises adverse community reaction to activities including prescribed burning.

### **3. The impact of prescribed burning and recent wildfires on Victoria’s biodiversity, wildlife and natural assets including water and quality**

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- 3.1 Comment on this Term of Reference is beyond VFBV’s specific expertise. However, VFBV recognises that all of these attributes will be affected to varying extents, particularly on aspects and slopes where fire intensity has been at its greatest.
- 3.2 The key issue arising from recognition of the destructive impact of high intensity wildfire is the need to establish a fire regime that seeks to replicate the environment that existed historically through regular ignitions either by indigenous populations, by settlers and squatters following colonisation or through natural events. These regular ignitions resulted in an extensive mosaic of burnt and unburnt country. In this context, the continued use of prescribed fire on a planned broad acre basis is to be encouraged.

### **4. The reporting process applicable to prescribed burning programs**

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- 4.1 VFBV considers that reporting processes for prescribed burning should be comprised of performance-based indicators directly linked to planned objectives. This is particularly important for measuring the effectiveness of prescribed burning. In this respect post-burn reports should focus on achievement of the extent of fuel reduction burning obtained.

## **5. The legislative and regulatory arrangements for prescribed burns and bushfire management**

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5.1 VFBV has no comment to make in relation to this particular issue.

## **6. The effectiveness of maintaining permanent, strategically placed fire breaks and containment lines throughout public land access**

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6.1 VFBV strongly supports the construction and retention of strategically placed containment lines on public land throughout Victoria.

6.2 Where containment lines are primarily established to protect private property, townships and public assets including water storages, containment lines should be augmented by prescribed burning to effectively deepen the line to provide a more substantial barrier to the progress of fire.

6.3 Standards and locations for strategic fire breaks and containment lines should be determined through:

- community consultation;
- consultation with local volunteer fire brigades;
- a risk/threat assessment and scenario analysis;
- consideration of historic fire incidence and paths; and
- potential fire behaviour.

6.4 Access tracks and permanent containment lines to aid rapid response and strategic fire suppression should be considered as a key component of the revised Integrated Fire Management Planning (IFMP) process and implemented regardless of land tenure.

## **7. The provision and maintenance of large water points on crown land to assist with bushfire aerial taskforce operations**

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7.1 The requirement for water sources, whether for aerial or ground based suppression, should be linked to the risk associated with the landscape and the availability of access. These are the key man made factors that can have an influence on the development of a wildfire. Minimisation of the impact of wildfire on the broader landscape is entirely dependent on rapid intervention before an ignition has the opportunity to develop. When fires occur in remote areas, or have the potential to rapidly develop (e.g. on days of very high or extreme fire danger), the use of aerial fire attack becomes a time-critical tactic. To be effective, a rapid turn-around of these resources is essential. Achievement of a rapid turn-around is dependent on access to suitable water sources.

7.2 However, aerial suppression capability should not be seen as the panacea for all wildfire suppression. Research conducted in Australia and overseas has identified the limits above which direct attack using aircraft is ineffective. It is also widely accepted that aerial attack alone is insufficient

to achieve containment and must be supported by ground attack to ensure a fire is made secure. Whilst dry fire fighting techniques are used extensively in forested areas to secure a fire edge, the application of water still remains the most effective tactic to make a fire edge safe. Whilst not specifically covered within the scope of this issue, VFBV suggests that the provision of water sources for ground based fire suppression resources is equally important as those required for aerial suppression.

- 7.3 Whether provided for the use of ground or aerial resources, the key objective remains the same - the availability of a reliable source of water in locations designed to minimise the turn-around time of a tanker or aircraft and thereby limit the opportunity for a fire to develop to the extent that it progresses beyond capability of suppression by direct attack.
- 7.4 Any assessment aimed at securing the increased availability of static water sources should be landscape based and not solely confined to public land.
- 7.5 During the 2006/07 fire season, CFA purchased and deployed a number of portable water tanks (collar tanks) to supplement water supplies in areas impacted by the drought. This strategy should continue and should be funded accordingly.
- 7.6 The Government's initiative to replace essential private water supplies in rural areas this year was considered to be an effective policy and should be continued during fire seasons when available water is limited.

**8. The impact of traditional land uses such as timber harvesting, grazing, four wheel driving, hunting, camping, mining, and prospecting on the scale and intensity of bushfires and the ability of the relevant agencies to respond**

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- 8.1 VFBV makes comment on this issue not in the context of the impact of these activities but rather the impact of the cessation of some of these activities.
  - 8.1.1 According to anecdotal evidence, the cessation of logging in many areas and the rehabilitation of associated infrastructure have adversely impacted on access into many areas of the State that are now either closed to logging or have been reclassified as National Parks. In VFBV's view, in some circumstances, access foregone is the opportunity for an aggressive initial attack foregone.
  - 8.1.2 Timber harvesting of state forests sustained a large industry with substantial employment and machinery in, or in close proximity to, the forest. The staff profile of both the Department and the forest industry has changed substantially over the past few decades, resulting in reduced availability of human and physical

resources for direct fire suppression or support to the overall fire suppression effort.

- 8.1.3 Compared with the circumstances that existed a number of years ago, the closure of many tracks in state forest and national parks, and the restricted entry for recreation motor vehicles has had a negative impact on the maintenance of access tracks. It is well known that the majority of people who use access roads and tracks on public land do so responsibly and contribute to keeping many access tracks clear and serviceable. The adoption of a more flexible approach to vehicle access to public land will not only assist track maintenance but will enhance community understanding and appreciation of the natural environment.
- 8.1.4 Further anecdotal evidence suggests that the reduction of public land employees with a primary interest in the production of commercial timber has resulted in a corresponding reduction in the workforce with an intimate knowledge of the public land. VFBV is advised that this has occurred due to the absence of the need to “walk the forest” to determine the location etc. of merchantable timber.
- 8.2 Whilst these may be insignificant issues, they demonstrate that the changes in land management objectives and skills of the work force have, over time, resulted in a loss of fire management expertise and resources that have not necessarily been compensated for in other ways.
- 8.3 It is recognised that DSE may have access to a wide range of Government employees through inter-departmental relationships and the co-location of some Departments. VFBV contends that this workforce dimension is comprised of a significant number of employees whose role is not connected with fire and who do not possess the current competencies and experience to fill the void created by the shift in land management objectives.
- 8.4 Whilst it is recognised that there are a number of conflicting opinions as to the ecological impact of grazing on public land, there is a view that the presence of cattle contributed to a reduction in the quantity of surface vegetation that would otherwise add to the propagation and intensity of a bushfire. The exclusion of cattle from public land has the potential to result in surface fine fuels accumulating to levels that are more likely to support the rapid development of high intensity bushfires and militate against the likelihood of successful first attack.
- 8.5 VFBV considers that in those areas where grazing is no longer permitted, DSE and Parks Victoria should implement alternative measures to ensure that similar outcomes to that previously achieved through grazing are maintained.
- 8.6 VFBV believes that cessation of the above activities has increased the need to provide fire suppression on public land.

## **9. The provision and maintenance of serviceable access tracks and signage to assist with recreational and emergency requirements**

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- 9.1 VFBV supports the philosophy that in order to limit the development of damaging wildfires early detection and rapid intervention is essential.
- 9.2 Achievement of rapid intervention is primarily predicated on being able to gain access to an ignition in a reasonable period of time that is matched to the fire behaviour likely to be exhibited once a fire attains a steady state of development. Primary access is also of paramount importance once fire intensity exceeds the parameters for direct attack so that heavy equipment can be deployed without excessive delay to construct access to permit the deployment of these resources. In many cases valuable time is lost as heavy plant is required to construct access to the location where it is needed rather than being able to be rapidly transported as close as possible to the fire and then deployed on the required task.
- 9.3 VFBV believes that access tracks and roads on public land should be constructed and maintained to a standard commensurate with the risk associated with wildfire development and impact on a particular parcel of land or fuel management zone (i.e. the higher the risk or value of the land, the higher the standard of access). The requirement for and standard of access should be identified using a range of factors including fuel type and quantity, fire behaviour, intensity, distance from initial attack resources and asset value.
- 9.4 Over many years, Government departments responsible for the management of public land have invested significant proportions of their budgets on the construction and maintenance of access for fire and other management responsibilities. As land tenure has changed, the maintenance and additions to this infrastructure has similarly changed with a strong perception by CFA volunteers of a gradual net reduction in the extent of road and tracks being constructed and/or maintained. There is also a perception that, as priorities and management objectives have been amended or modified, budget allocations once available for this important work have been siphoned off to other projects. From time to time, particularly following major fire events, additional funds appear to be appropriated to lift the standard and extent of this work. However, it appears as though the allocations are never adequately maintained over the longer term. This year, the Government is due to receive additional funding from the Commonwealth Government to assist with fire access. VFBV welcomes this initiative but considers that the Department's rationale for construction and maintenance of access lacks the rigour and supporting specifications to gain the maximum benefit from the allocation. Indeed, VFBV argues that if the level of funding previously allocated to these tasks had been maintained with appropriate annual relativity, some of the issues associated with inadequate access may not be as prevalent today as they are.

- 9.5 VFBV recognises that on occasions additional access tracks may be constructed for purposes other than solely for fire management (e.g. timber harvesting). Given the effort and expenditure associated with construction of these tracks, VFBV considers that prior to embarking on post-logging or other rehabilitation; the tracks should be assessed for future use for fire access.
- 9.6 It is also recognised that a significant number of tracks were established during the 2006/07 fire season for access and to act as containment lines. VFBV considers that the future of this infrastructure should be subject to an assessment in which the primary and overriding question is *“will the retention (and on-going maintenance) of these tracks aid future fire management”*. If the answer is in the affirmative, then arrangements should be established to ensure that they remain as viable means of access and subject to an appropriate maintenance regime.
- 9.7 VFBV also considers that materials used for road and track signage on public land should be reviewed. Whilst current signage may be aesthetically pleasing and in keeping with the environment, they are of little help following the passage of a wildfire when destruction of the signage often occurs. Consideration should be given to more durable signage and, in line with the increasing use of GPS, inclusion of GPS references on road and track signage strategically located throughout public land.

## **10. The impact of climate change on bushfires and public land management**

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- 10.1 If current scientific opinion on the future effects of climate change eventuate, the impact on fire management on both public and private land is likely to be significant. Many experts predict that the potential for longer and drier periods will be coupled with more extensive and intensive wildfires.
- 10.2 In a preliminary analysis, VFBV notes that the following issues will require increasing attention and in-depth analysis as the trends associated with climate change become more definite:
- 10.2.1 Pre-season preparedness will need to be more rigorous, with stronger links to scientific assessments and scenario analyses giving rise to greater uncertainty.
  - 10.2.2 Increased budgets and annual budget flexibility may be required as the severity of seasons vary more widely.
  - 10.2.3 Allocation of funds for research and development into alternative fire suppression strategies/resources due to the impact of climate change will need to be addressed.

- 10.2.4 Requirement for longer-term assessments of the impact of climate change, not only on the landscape but also related to the availability of people and resources. In rural areas, climate change may have a significant impact on land use and agricultural viability. In the event that these scenarios are realised, significant adjustments to demographic distributions may occur that could have the potential to impact on the recruitment and retention of CFA volunteers.
- 10.2.5 The impact on national water initiatives and the availability of water may impact on the extent of irrigated pasture throughout the State with a return to dry land and an inherent increase in fire risk in many areas.
- 10.2.6 The potential for an increase in the number and frequency of wildfires as a result of climate change will have an impact on many of the issues raised in this submission. For this reason, many of the items raised should be considered as interim recommendations, or positions that will require substantial revision in the future.
- 10.2.7 Increased attention will need to be given to community engagement to ensure a more comprehensive understanding of the need for increased prescribed burning and other prevention/mitigation measures on public and private land.
- 10.2.8 Increased emphasis will need to be given to community education on self-help and personal/asset protection as the level of risk heightens in existing vulnerable areas and migrates to other areas that have traditionally avoided threats from high intensity wildfire.
- 10.2.9 The requirement to match the effects of climate change with community culture change with respect to the incidence and future impact of wildfire cannot be over emphasised. To achieve this shift, resources allocated to CFA and DSE will be required to work much more closely with common objectives and a common message. Additional resources may also be required to deliver the extent of change that may ultimately be required.

**11. Whether additional measures are required to provide a mechanism for the skills, knowledge and interests of local communities, and appropriate scientific expertise to be better represented in the management of bushfire risk on public land**

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- 11.1 As stated above, the predicted impact of climate change will require a substantial culture change within the community as adjustments to lifestyles, risks and hazards occur. In relation to the management of Parks and other public land, CFA volunteers are increasingly confronted with the attitude that certain works cannot be undertaken because the impact on the

environment is unknown. This excuse for inaction can no longer be accepted as the need for further analysis can and often leads to inaction.

- 11.2 Development of the IFMP concept should be accelerated thus providing a common platform and opportunity for increased community involvement and consultation in matters affecting their interest and welfare.
- 11.3 Scientific knowledge being acquired and research being undertaken through the Bushfire CRC must remain focussed on producing outcomes that benefit the community, rural/forest firefighters and land managers in recognition of the short and long term implications of climate change. Due to the uncertainty associated with climate change, State Government support for the CRC must continue to have a high priority to address many of the unknowns and position the State to better anticipate and react positively to any of the threatened impacts of climate change and/or global warming. The development of the IFMP process will assist in providing a common platform for this to occur.

## **12. The involvement of local communities in the management of fire**

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- 12.1 In many respects, the issues associated with the greater involvement of communities in fire management are linked to the issues raised in Section 11. The IFMP process seeks to integrate community (municipal) fire prevention and mitigation required under the *CFA Act* with what has, until now, been a process largely taken in isolation with respect to public land fire management.
- 12.2 As indicated, the evolution of this concept should be accelerated as it will provide a more holistic approach to community fire safety and one through which the community should develop a far greater understanding of their role and the impact of their activities on landscape based fire protection.

## **13. Any other matter that impacts on the scale and intensity of bushfires in Victoria**

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### ***Ability to access local knowledge***

- 13.1 Despite considerable gains made following the 2002/03 bushfires in relation to the integration of local knowledge into Incident Management Teams (IMTs), there still appears to be gaps in this capability or in the desire to “make it happen”. It is generally accepted that this is not an easy task, despite suggestions in 2003 to the contrary.
- 13.2 During a major wildfire, the people with the most detailed local knowledge are often not physically available as they remain committed to the protection of their own assets and livelihood. However, these people can often be accessed by telephone or through other communications media. The principle of local knowledge within an IMT should be sufficiently flexible to adopt the alternative of access to local knowledge as distinct from the

necessity to physically embed local knowledge in the Incident Control Centre (ICC). It should also be recognised that importing local knowledge into an IMT is only one solution to many location specific problems and issues that will arise during the course of a bushfire. It is not the panacea to all of these problems.

- 13.3 Greater utilisation of CFA volunteers in the various roles and within the functions of an IMT must be encouraged and not suppressed as is currently perceived to be the case. Volunteers also bring local knowledge and experience to the management team.

#### **Recruitment and deployment of project firefighters**

- 13.4 VFBV has some concerns at the timing of arrangements to recruit project firefighters. In the future, it is considered that the process needs to be more flexible and the “front end” initiated early to ensure staff recruitment coincides with emerging seasonal requirements. If the impact of climate change continues to grow as predicted, then so will the demand for project firefighters. More innovative solutions will be required to ensure that flexibility exists in the process and numbers can be increased (or reduced) without unnecessary delay. This may mean that this resource is engaged earlier, in increased numbers and for longer periods. VFBV considers that the benefits of having extra resources under deployed will outweigh the costs of late deployment.
- 13.5 It has been suggested that a number of personnel could be recruited and trained at the beginning of the season and then stood down until needed. There are, of course, significant disadvantages to this concept including the preparedness of personnel to sign on with no guarantee of longer term employment. However, this or a similar concept may be worthy of some consideration.

#### **Utilisation of interstate and overseas expertise**

- 13.6 Over the past few years, much has been made of the capacity to import experienced forest firefighters from interstate and overseas. Adverse comments regarding the costs associated with this program have also been raised from time to time. There is a delicate balance between the availability and preparedness of volunteers to undertake many of the roles for which interstate and overseas firefighters are imported, and the view that they may not be needed for some of these roles. Volunteers undergo extensive training to the same standard as paid DSE and Parks Victoria staff and international fire managers, and are more than capable of performing any of the roles within an IMT or in field leadership.
- 13.7 Some volunteers are of the view that the importation of interstate and overseas contingents has the potential to disenfranchise volunteers who may then withdraw from opportunities to maintain their skills and experience. This could potentially create a downward spiral in the availability of volunteers to perform these key roles during less intensive

periods and initiate a requirement for supplementary resources sooner and for longer.

- 13.8 Resourcing of an IMT should be based on the most suitable person for the position and the opportunity that participation affords in maintaining competencies, gaining experience and maintaining a strong and vibrant multi-agency workforce. Of concern is the increasing trend toward the utilisation of paid staff from DSE/Parks Victoria and CFA in deference to the use of volunteers when they are available. VFBV warns that continuation of this concept will eventually be self-defeating in that the pool of CFA volunteers available and willing to undertake these tasks will diminish to the extent that the integrity and safety of day-to-day operations may be jeopardised. This is a delicate issue that will require careful consideration of both sides of the equation.

#### **Incident management**

- 13.9 Victoria's emergency management arrangements currently provide for a single agency to be designated as the responsible agency with respect to any one fire or complex of fires. Personnel are then usually allocated with some bias towards personnel from the Controlling Agency. Whilst VFBV supports the principle that there should only be one agency in control, the assignment of personnel to various roles within an IMT should be more strongly directed towards the assets at risk. For example, a Division or Sector Commander charged with the responsibility to establish a containment line to protect assets within the "country area of Victoria" or on the urban/rural interface should be under the command of a CFA commander. Likewise, back-burning in remote areas to protect additional forested areas should be under the command of a commander from DSE/PV. Adoption of this principle will provide further opportunities for consideration of local input, ensure equitable opportunities to gain experience, maintain competencies, and maintain each responsible agency's focus on their legislative and community responsibilities.