NSW RURAL FIRE SERVICE

SENATE FINANCE AND PUBLIC ADMINISTRATION REFERENCE COMMITTEE'S INQUIRY INTO THE LESSONS TO BE LEARNED IN RELATION TO THE AUSTRALIAN BUSHFIRE SEASON 2019-20

NSW RFS SUBMISSION

Contents

Introduction

The 2019-20 bush fire season was the worst ever experienced in NSW. A combination of one of the worst droughts on record, unprecedented weather conditions and intense fire behaviour resulted in over 5 million hectares being burnt across the State. Twenty six lives were lost, 2,448 homes destroyed and extreme damage caused to the natural environment and wildlife as a result. The season challenged the NSW RFS and other NSW agencies like never before.

The NSW RFS appreciates the extraordinary commitment and resilience shown by its members throughout the fire season, and values the input of its volunteers and the local community. It is appreciated that the extraordinary nature of the 2019-20 bush fire season and its impact on people, towns and communities will drive those affected to discuss and air their views and opinions on response and other matters.

The NSW RFS acknowledges and supports Mr Gorman in seeking to make his submission dated 10 May 2020. In responding to the submission, the NSW RFS has noted the issues of local management in the Shoalhaven District raised by Mr Gorman, but has focussed the response on the substantive issues raised by Mr Gorman in the form of the suggested recommendations and associated commentary.

Suggested recommendation 1

The Commonwealth to introduce national standards and procedures in relation to bushfire planning including:

- *a. national standards for LGA bushfire planning;*
- *b. national standards for bushfire planning for critical infrastructure including:*
  - *a. national standards for bushfire risk assessment*
  - *b. national standards for bushfire mitigation plans*
  - *c: national standards for management plans*
  - *d. national standards for pre-incident plans*

The NSW RFS does not support stringent national standards and procedures in this space. A one size fits all approach to bush fire planning cannot work because of the differences in land use and vegetation types across the country.

The bush fire risk planning process in NSW is already reflective of national standards based on the *Australia/New Zealand Standard AS/NZS 4360: 2004 Risk Management* (AS/NZS) and reflects the principles of the National Strategy for Disaster Resilience and the National Emergency Risk Assessment Guidelines (Guidelines).

These standards and principles recognise that bush fire risk planning needs to be undertaken at the lowest level possible and tailored to local areas. To be effective, the process requires local input and local discussion of the assets at risk and the treatments suitable for those risks. Local knowledge is very important in this planning process and risk planning must be relevant to and accepted by the community facing the risk.

The current process in NSW involves two inter-agency committees who are responsible for coordinated bush fire risk management, including the determination of specific protection priorities:

a) ***Bush Fire Coordinating Committee (BFCC):*** The peak body for bush fire risk management in NSW, constituted under section 46 of the *Rural Fires Act* 1997 (RF Act).

Section 47 of the RF Act requires the BFCC to be comprised of representatives of NSW RFS, FRNSW, National Parks & Wildlife Service, Department of Planning, Industry and Environment, NSW Police, NSW Forestry Corporation, Local Government NSW, Minister for the Environment, Nature Conservation Council of NSW, NSW Farmers' Association, Rural Fire Service Association.

The functions of the BFCC are set out in section 48 of the RF Act and include planning in relation to bush fire prevention, and advising the NSW RFS Commissioner on prevention, mitigation and coordinated bush fire suppression.

b) ***Bush Fire Management Committees (BFMCs):*** The BFCC is required by section 50 of the RF Act to form BFMCs for each area in the State subject to the risk of bush fire. BFMCs are multi-agency committees responsible to the BFCC and subject to the BFCC's directions. There are currently 56 BFMCs across NSW. The purpose of each BFMC is to provide cooperative interaction between organisations, agencies and the community for coordinated bush fire management in the BFMC area. BFMCs comprise local representatives of the agencies represented on the BFCC, as well as local NSW RFS volunteers and other people approved by the BFCC.

Section 52 of the RF Act requires BFMCs to prepare the following bush fire management plans:

(i) a bush fire risk management plan (BFRMP);

(ii) a plan of operations setting out how the agencies in the BFMC area will integrate and coordinate themselves to protect the community from bush fires; and

(iii) fire access and fire trail (or FAFT) plans which set out appropriate means of accessing land to prevent, fight, manage or contain bush fires.

BFRMPs are the central platform through which specific protection priorities are determined by BFMCs, under the guidance and supervision of the BFCC. The process provides for analysis and decision making at the local level by reference to local knowledge, but in line with the guidance and framework of a state-based approach through the BFCC (and with the BFCC having the ultimate approval power) as well as the national AS/NZS and Guidelines. In overview, the process results in the determination of protection priorities as follows:

(a) The preparation of a BFRMP in accordance with the requirements of the RF Act and BFCC 'Policy 01/08 – Bush Fire Risk Management' which provides the framework for a structured and rigorous process for coordinated assessment of bush fire risk in a BFMC area and determination of protection priorities for that area. The key elements of the BFRMP process are:

(i) identification of assets at risk of bush fire and assessment of the level of that risk;

(ii) a tenure blind risk assessment that prioritises assets for protection and assigns mitigation treatments to manage risks; and

(iii) assignment of mitigation treatments to a land manager or other responsible agency for completion.

Community engagement and ownership is a fundamental element of this process.

(b) BFRMPs generally categorise relevant assets into the following groupings:

(i) human settlement assets, such as townships and commercial and industrial areas;

(ii) economic assets, such as infrastructure, commercial forests, tourist destinations and land used for primary production;

(iii) environmental assets, such as threatened species, vulnerable species and locally important flora and fauna; and

(iv) cultural assets, such as areas of Aboriginal or European historical or cultural significance.

(c) For each asset, the likelihood and consequences of bush fire affecting the asset (or group of assets) is assessed.

(d) The combination of the consequence risk assessment combined with the likelihood risk assessment determines the treatment priority for a particular asset.

(e) This process is conducted for each of the hundreds of assets identified in each BFRMP.

A BFRMP is informed by locals for locals. There is a statutory requirement for each BFRMP to be publicly exhibited to provide the community an opportunity to voice their concerns or otherwise advise of issues or matters that may have been missed in the planning process. This community consultation and engagement is a key element of the BFRMP process.

Regarding the Shoalhaven area, specifically Kangaroo Valley, the NSW RFS notes that a meeting was conducted with the Kangaroo Valley Rural Fire Brigade (RFB) in August 2017 (including Mr Gorman as then Captain of the Brigade) to discuss hazard reduction proposals for Strategic Fire Advantage Zones (SFAZs) identified within the draft Shoalhaven BFRMP. At no time during or following this meeting were concerns raised regarding the location and/or inadequacy of the identified SFAZs in Kangaroo Valley.

The draft Shoalhaven BFRMP was publicly exhibited as per BFCC guidelines and requirements. In addition, the exhibition of the draft BFRMP was discussed at a Group Meeting in June 2018, which included Mr Gorman as then Captain of the Kangaroo Valley RFB. Hard copies of the plan were distributed at that meeting and submissions were encouraged.

The NSW RFS noted that no submissions were received in relation to the draft BFRMP. The plan was subsequently endorsed by the Shoalhaven BFMC in October 2018 and approved by the BFCC in March 2019.

The NSW RFS is also in the process of preparing Community Protection Plans (CPPs) for relevant areas throughout NSW. CPPs are a place-based approach to community engagement and management of bush fire risk in specific communities; they provide the public, fire services and land management agencies with easy to understand information specific to their community. CPPs involve a series of community meetings, aimed at understanding the community's perception of bush fire risk and local assets, as well as helping to identify critical infrastructure such as schools, hospitals, etc.

There are currently 145 individual CPPs state wide, of which 122 have been signed off by the relevant BFMCs, and this is an area of ongoing development across the State. Owing to the number of communities, it will take some time to prepare these for all areas, including Kangaroo Valley.

Finally, the NSW RFS notes that the Royal Commission into National Natural Disaster Arrangements is currently examining the responsibilities of, and coordination between, the Commonwealth and State, Territory and local Governments relating to preparedness for, response to, resilience to, and recovery from, natural disasters, and what should be done to improve these arrangements.

Suggested recommendation 2

The Commonwealth to introduce national standards and procedures in relation to bushfire fuel load management including:

a. recognition of best practice fuel load management as being a top national bushfire mitigation priority

b. predetermined levels of maximum fuel load in respect to categories of land use

c. national procedures for issuing public warnings when fuel loads exceed predetermined levels

d. national procedures for the establishment of ongoing 5-year rolling programs for hazard reduction actions at the LGA level

e. national procedures for publicly available reporting on hazard reduction by responsible agencies

Best practice fuel load management and levels of fuel load

As noted above, the approach to bush fire risk planning, and therefore fuel load management, in NSW is already reflective of national standards in that it is based on the AS/NZS and reflects the principles of the Guidelines.

The NSW RFS submits that a rigid national standard or procedure for fuel load management would be inappropriate for two primary reasons:

1. As provided by section 63 of the RF Act, the primary responsibility for fuel load management for the prevention and minimisation of bush fires rests with the land manager, owner or occupier of the relevant land. Local landowners need to take responsibility for their statutory obligations and are unlikely to be assisted by the imposition of national standards.
2. A national standard would not cater to the vast differences in vegetation, land ownership and communities which exist across Australia.

The approach to hazard reduction in NSW is based on a qualitative rather than quantitative measure of risk. The principle is to manage the fuel in the landscape (in combination with other processes) by reference to the intent associated with the relevant Bush Fire Management Zones (discussed below) to meet suppression objectives. This involves an application of available resources by reference to strategic prioritisation of assets and risks, and is not based on specific hectare-based targets.

Methods for determining areas in which to be undertaken

Decisions on areas for hazard reduction works are made through a localised, multi-agency approach. That process requires balancing of the asset protection objectives of hazard reduction with a broad range of other factors including the safety of the community and fire fighters, risk of unintended property damage, environmental considerations and the impact of smoke, by reference to bush fire management zones and fire thresholds as outlined below.

Bush Fire Management Zones

Once the assets prioritised for treatment are identified (through the BFRMP processes discussed above), BFRMPs generally map those assets by reference to the following types of Bush Fire Management Zones:

- Asset Protection Zones (APZs): Fuel-reduced areas surrounding an asset (such as residential, industrial or heritage buildings, cultural or community assets) adjacent to bush fire hazards.
- Strategic Fire Advantage Zones (SFAZs): Strategically located areas that are more intensively managed for fuel load than the general landscape to enhance APZs and provide additional opportunities for fire suppression. This outcome is achieved in SFAZs by reducing the fire intensity in those areas, allowing for closer containment by firefighters, and reducing the generation of embers which could impact on assets or propagate fire through spotting.
- Fire Exclusion Zones (FEZs): Areas of vegetation from which fire (both bush fire and prescribed burns) should be excluded altogether.
- Land Management Zones (LMZs): All areas that are not mapped as APZs, SFAZs or FEZs.

Classification of areas into these zones allows the BFMC to identify the 'fire management intent' for a specific area in the course of considering the appropriate mitigation treatments.

The bush fire risk management planning framework typically provides for a focus on treatments in APZs and SFAZs, thereby prioritising treatment intended to protect human and economic assets. Due to the proximity to protected assets, hazard reduction in APZs is typically achieved via mechanical clearing, mowing and under-scrubbing, with a limited amount of prescribed burning. In contrast, prescribed burning is the most common hazard reduction treatment in SFAZs.

Generally, treatment of LMZs is of a lower priority, primarily due to the fact that treating the areas closer to properties provides the biggest protection and ‘return on investment’ of resources. However, the broader landscape must be also addressed so that the age of fuels is ideally varied in a mosaic pattern across the landscape.

Prescribed burns undertaken in SFAZs and LMZs generally follow a 'mosaic' pattern, where smaller parcels of land within a broader area identified for hazard reduction are burned over a number of years. This approach creates pockets of lower fuel loads within the broader landscape where suppression efforts are safer and have a greater prospect of success. This is because fires generally spread more slowly through, and burn with less intensity within, a mosaic of fuel age classes. It also lessens the impact on flora and fauna species.

Fire thresholds

In addition to fuel load triggers, fire frequency thresholds have been introduced and inform BFMCs for those areas within the landscape that are not within threshold and are targeted for HR treatment.

BFMCs also use Fire Threshold Maps as an input to determine areas that are a priority for hazard reduction treatments. These maps are produced for BFMCs at state level due to the complexity of the data analysis involved in their production.

The frequency with which prescribed burning can occur in a particular area depends on a number of factors, including the 'fire threshold' of that area. The 'fire threshold' for any given area at any point in time varies depending on a range of factors, such as the types of vegetation in the area, weather conditions and past bush fire or burn activity.

A typical hazard reduction burn cycle (ie the period of time following a burn before another hazard reduction burn can be undertaken) ranges from 5 to 25 years. The cycle is based upon the regeneration

time of the predominant vegetation in the area. The Bushfire Environmental Assessment Code for New South Wales prescribes the 'minimum' fire threshold for areas populated by certain types of vegetation.

The fire thresholds are the basis for recommended minimum and maximum fire intervals based on the ecology of species in the vegetation formations. In summary, the basic theory is that:

- Above threshold areas are areas where the time since fire is greater than the recommended maximum fire interval. This does not, however, necessarily mean that the area needs to be burnt – there are a broad range of factors that go into that analysis, of which the 'above threshold' designation is just one. For example, if an area provides important habitat functions for a suite of species or the vegetation type is rare, it might be considered more beneficial not to burn the area despite the threshold status.
- Below threshold areas are areas where the last fire is more recent than the recommended minimum. The general principle is that fire in these areas should ideally be avoided until the minimum number of years has passed.

BFMCs use Fire Threshold Maps to inform treatment strategies and to plan appropriate mosaic hazard reduction burning within their area. For example, when determining treatment priorities, priority for hazard reduction burning treatments may be given to areas which are 'above threshold' or 'within threshold' over those that are 'below threshold' (subject to the broader analysis mentioned above). Similarly, when looking at broad scale mosaic burning as a treatment strategy, fire threshold maps can assist with the order in which each patch is burnt.

Treatment Registers

The proposed treatments for each asset identified in the course of the BFRMP process are recorded in the Treatment Register, which is an appendix to the BFRMP. The Treatment Register sets out at a general level, for each identified asset:

i. the proposed treatment action;
ii. the agency (or agencies) responsible for implementing the treatment; and
iii. any agency (or agencies) that are not land managers or owners but will assist in undertaking the treatment activity if requested.

Public warnings

Mr Gorman has suggested that public warnings should be issued when fuel loads reach certain levels. The NSW RFS submits that it would be neither practical nor useful to the community to provide such warnings to the community. The nature of fuel load management, in particular hazard reduction burning, is that it is both highly variable (in particular due to weather contingencies) and highly scientific. The issue of fuel loads is not appropriate or well suited to public warnings.

As BFRMPs and annual works plans focus on areas that are above threshold, and are publicly available, they therefore inform the public of those areas in which fuel loads exceed predetermined levels.

Rolling 5-year programs

While the submission refers to the need for rolling 5-year programs for hazard reduction at the LGA level, this is already met by the BFRMP process in NSW. Under section 52 of the RF Act, the BFRMP for each rural fire district must be reviewed and updated within each successive five-year period.

Reporting of hazard reduction works

Hazard reduction works in NSW are recorded by reference to treatments, and reported by reference to hectares treated and properties protected. Hazard reduction works are also reported by reference to planned works and the percentage of those planned works completed (including in the NSW RFS's Annual Report). These planned works are the full quota of hazard reduction works programmed into BRIMS for a given year (including contingent work programs).

The manner in which works are reported by NSW RFS in its annual reporting reflects the collaborative, multi-agency approach to hazard reduction works in NSW, and the fact that under statute, the responsibility for hazard reduction rests with landholders.

Finally, the NSW RFS notes that the Royal Commission into National Natural Disaster Arrangements is currently examining the responsibilities of, and coordination between, the Commonwealth and State, Territory and local Governments relating to preparedness for, response to, resilience to, and recovery from, natural disasters, and what should be done to improve these arrangements.

Suggested recommendation 3

The Commonwealth to independently evaluate implementation by State and Territory governments of the National Strategy for Disaster Resilience in rural communities, particularly in relation to community engagement and partnering, and tie resilience funding provided by the Commonwealth to the results of this independent evaluation.

Through the National Partnership agreement on Natural Disaster Resilience, the Commonwealth and the States and Territories have recognised that they have a mutual interest in reducing the impact of, and increasing resilience to, natural disasters and need to work together with local government, business, the nongovernment sector, communities and individuals to achieve these outcomes.

The NSW RFS participates in the National Disaster Resilience Program (NDRP) which is jointly funded by the Commonwealth and NSW Government, and provides funds for projects that contribute to the priorities of the National Strategy for Disaster Resilience.

Current Commonwealth and State partnership arrangements such as NDRP achieve the outcome sought by this Recommendation. Consistency and compliance with the arrangement is embedded in the program as part of funding bids and must also be demonstrated as part of State reporting requirements.

The NSW RFS Community Engagement Strategic Directions 2017-2021 reiterates that community engagement is a core function of the NSW RFS, and the projects and directions identified within are directly aligned to the Commonwealth Government’s National Strategy for Disaster Resilience.

The NSW RFS notes other local management issues particular to Shoalhaven District which have been raised by Mr Gorman. Regarding the commentary provided about the location of the NSW RFS HQ, this matter has been the subject of previous public commentary and response by the NSW Government. In summary, the Sydney Olympic Park site was chosen based on organisational and operational requirements of the NSW RFS. The NSW RFS headquarters is the hub of a highly decentralised organisation, and headquarters’ staff support areas and districts across the State. The location has inbuilt capability to enable local, state, national and international media to attend at the headquarters and conduct live broadcasts. It is also located in close proximity to the other emergency service organisations and government agencies with which the NSW RFS interacts. The location provides technological

availability, capacity and performance, as well as critical redundancies in terms of power supplies, communications systems (including dual independent optic fibres), mains water supply and access to direct optic and satellite media feeds.

Commentary in respect of the operation and focus of former and current Commissioners of the NSW RFS is rejected. The NSW RFS does not consider that any response to this commentary will assist the Inquiry.

Suggested recommendation 4

The Commonwealth to establish a national framework setting out respective rights and responsibilities in the relationship between volunteers and State rural firefighting combat agencies such as the NSW RFS as well as an accountability and reporting framework and national standards including:

a. *clarification of rights and responsibilities of volunteers to their community as compared to the relevant State combat agency*
b. *the right of volunteers to protect their communities using means such as back burning when the relevant State combat agency fails to provide such means of protection*
c. *obligations of State combat agencies to volunteers and the communities from which they come including use of brigade resources including those that have been funded by the community*

The NSW RFS notes that national volunteer frameworks are already in place. The National Emergency Management Volunteer Action Plan recognises that Australia's capacity to respond to natural disasters is largely based on a range of specialised volunteer-based organisations, and without dedicated, well-prepared and resourced volunteers, the ability of Australian communities to respond to natural disasters would be catastrophically reduced.

The Australian Emergency Management Volunteer Forum provides a national voice for the volunteer emergency sector.

In light of the unique and enshrined role of volunteers in first response in Australia, States and territories including NSW seek to ensure that in the operation of emergency services, volunteers are valued, engaged and honoured for their important contribution.

The NSW RFS is a community based service. The RF Act establishes brigades as a part of the NSW RFS, and each brigade is comprised of local community members. Local representation in NSW RFS decision making processes is strong. Volunteer views are canvassed in a number of ways including through RFSA representation, at Group Officer forums and senior volunteer forums, through representation on BFMCs and interaction with local Districts.

However, it is ultimately the NSW RFS that has statutory responsibility for the prevention, mitigation and suppression of bush fires and it must ensure that appropriate mechanisms and structures are in place to achieve this.

In terms of the management and coordination of bush fires, the NSW RFS employs the nationally recognised system of incident management, the Australasian Inter-service Incident Management System (AIIMS). All people on the fire ground work within the nationally agreed and recognised AIIMS system. This structure is used by agencies across Australia, and is specifically designed to be scalable. AIIMS is capable of handling fire incidents ranging from a single truck incident to large and devastating fires such

as those seen in the 19/20 season. A structure and chain of command such as that established by AIIMS is necessary in coordinated emergency response operations.

Under section 44 arrangements, Incident Controllers and Incident Management Teams (IMTs) are required to incorporate local knowledge as appropriate during an incident, and there is typically strong local membership on IMTs. The NSW RFS readily acknowledges that local knowledge was central to the response to the 2019-20 bush fire season.

Issues and concerns with unauthorised back burning were canvassed in the Coronial Inquiry into the Sir Ivan fire. The NSW RFS submitted that unauthorised back burns can change the amount and location of fire in the landscape in a way not planned or desired by Incident Controllers, forcing the relocation of fire fighting resources and the unintended amendment of incident action plans by the IMT. The Coroner's findings in that matter supported the concerns held by the NSW RFS that unauthorised back burning can significantly impact the effectiveness of fire fighting operations, the duration of a fire and safety on the fire ground.

Further, the NSW RFS notes that the management and coordination of bush fires has been the subject of considerable coronial, parliamentary and other reviews. One of the key outcomes of these reviews has been the importance of a coordinated response across land tenures and agencies to ensure the safety and protection of fire fighters and emergency service workers as well as the preservation of life and property of the community.

Suggested recommendation 5

The Commonwealth to establish a national framework setting out respective rights and responsibilities in the relationship between private firefighting resources and State rural firefighting combat agencies such as the NSW RFS.

The NSW RFS does not believe that a national framework is appropriate for this issue. While the National Disaster Resilience Strategy recognises that increased disaster resilience is a shared responsibility across the whole of society, the Strategy emphasises that this will be best achieved by tailoring strategies to local communities.

Private equipment on NSW fire grounds is typically used in the following three circumstances:

1. Where it is contracted to perform works and services though a NSW State Government Supply Agreement, including, but not limited to, Aviation (water bombing), Heavy Plant, Bulk Water, Transport and some catering /accommodation equipment.
2. Ad hoc engaged works and services though the NSW RFS Heavy Plant program, where a piece of private equipment (plant) is in close location to a fire and use of such plant will substantially limit the spread of fire, and there is no closer more appropriate resource.
3. Private equipment owned by property owners / primary producers used in the course of their agricultural operations including fire fighting on their land or neighbouring properties.

Over the last 5 to 10 years there has been an emergence of commercial operators conducting private contracted hazard reduction and prescribed burning services. These private entities have made approaches to the NSW RFS during fire operations in the 2019/20 season.

When engaging private contractors / equipment, the NSW RFS must do so in light of any applicable NSW Government Procurement Policy and Guideline, which includes ensuring that the equipment, in addition to meeting all safety and legislative requirements, is:

- Fit for purpose;
- Functional, and
- Relevantly insured and indemnified.

The NSW RFS acknowledges the historical practice of farmers/members of community protecting their own and their neighbour's properties in the event of a bush fire. The use of farm equipment and vehicles (e.g. farmer utes and tanks) at fires is relatively common occurrence.

However as the Agency has matured and emergency management arrangements in areas such as bush coordinated fire fighting safety management practices has developed, a more contemporary approach has developed.

The NSW RFS notes the examples cited by Mr Gorman with reference to the Sir Ivan fire. The NSW RFS participated in the Coronial Inquiry into the Sir Ivan Fire, where the emerging community sentiment towards the use of private fire fighting resources was examined. Collectively with counsel assisting and NSW Farmers, the NSW RFS provided input to the recommendations which centred around engagement with farmers, fireground communications and the operation of farmers on firegrounds. In handing down her findings, the Coroner made the following recommendation:

> "That the NSW Rural Fire Service, in consultation with NSW Farmers, extend and expand primary producer engagement strategies to include a focus on how private landholders within farming communities can work with the RFS, including a focus on information sharing outside of bushfire season, fire ground communication during a fire, fire ground management structure and firefighter safety."

In May 2020, Commissioner Rogers advised members of nine immediate priorities for the NSW RFS over the next twelve months, including farm fire unit integration. This priority recognises that farmers are a critical part of the firefighting effort, and important partner in managing and responding to the threat of fire across our landscape. The NSW RFS seeks to work to ensure farming communities are well prepared, and to strengthen response communication with farm fire units to prioritise and protect important agricultural assets.

Suggested recommendation 6

Utilising existing smart technology, the Commonwealth to fund and develop a national fire permit and fire reporting system that provides consistency in fire management and reporting including the following components:

a. an app-based fire permit system called MyFire
b. MyFire linked into a map layer on the Fires Near Me app to inform the public of permitted local fires
c. an app-based fire reporting system called ReportAFire
d. fires reported by 'ReportAFire' to be crossed checked automatically against known fires

The NSW RFS notes that issues relating to the provision of technology, coordinated arrangements and community information and warnings across tenures and state boundaries are currently the subject of examination by the Royal Commission.

Each State and Territory within Australia administers emergency response arrangements by statute. The functions of the NSW RFS relating to the issuing of permits and fire reporting and information are largely addressed within the RF Act. Given the statutory differences between States and Territories, the NSW RFS submits that a national fire permit and reporting system would not be practical. Additionally, fire permits must be issued with regard to local terrain and conditions. A standardised national fire permit system would not allow for these local considerations to be taken into account.

The NSW RFS has already developed Guardian, a multi-agency, spatial, bush fire risk information system, to replace the legacy BRIMS (Bush Fire Risk Information Management System). BRIMS is approximately 15 years old and no longer meets the requirements of the NSW RFS or its partner agencies.

Guardian will deliver to the NSW Government a consolidated view of risk assessment and prevention activities planned and conducted by NSW RFS and partner agencies across NSW. It will assist in the planning, implementation and reporting of all activities to reduce bush fire risk by all stakeholder organisations. It will meet legislated reporting requirements by providing current and reliable data as requested.

Information contained within the Guardian system will be displayed publicly, to assist in informing the community about bush fire risk near their homes.

Guardian is a multi-agency system which has been developed through engagement with all NSW fire fighting and land management agencies, including Fire and Rescue NSW, Forestry Corporation of NSW, National Parks and Wildlife Service, Crown Lands and Local Government.

Guardian will capture information across all land tenures and all agencies to provide a consistent state-wide dataset for use in fire fighting.

Guardian consists of the following modules:

- Fire Permits - providing online ability for the public to apply for permits and for NSW RFS to issue, cancel and suspend permits for operational reasons and during Total Fire Bans.
- Burn Notifications - providing online ability for the public to submit burn notifications allowing the NSW RFS to remain situationally aware for fire in the landscape and respond to any calls for assistance.
- Development Assessments – enabling NSW RFS to respond to Council requests for bush fire risk impact analysis for submitted development applications.
- Activity Management which consists of the following:
    - Burn Activities – planning and recording outcomes for hazard reduction via burning;
    - Mechanical Activities – planning and recording outcomes for hazard reduction via mechanical means;

- Environmental Assessments – recording assessments undertaken prior to any hazard reduction activity and ensuring planned activities adhere to the legislated Bush Fire Environmental Assessment Code;
- Supporting Bush Fire Management Committees (BFMC) – recording and updating Bush Fire Risk Management Plans and related activities within each BFMC area;
- Hazard Complaints – recording complaints raised regarding potential hazards, assessments undertaken and any subsequent actions;
- Community Engagement – recording community engagement, by any media, with regard to hazard reduction and other risk mitigation activities and linking the engagement to the related activity;
- AIDER – tracking delivery of works under the AIDER (Assist Infirm, Disabled and Elderly Residents) program for members of the public who require assistance; and
- Mitigation Service – providing the ability to plan and manage mitigation activities.

Guardian will improve business processes through a closer integration of risk assessment, activity management and spatial location. These improvements will enhance data quality through the reduction of double entry and provide efficiency gains to all users of Guardian. Through its ability to connect to and use data from other systems, Guardian will provide significantly more data, at a higher standard, for use in mitigation activities. This improvement in data will assist in decision making, produce staff productivity improvements and efficiency gains in data handling, data processing and responding to stakeholders.

Guardian will be able to produce both consistent and bespoke reporting of mitigation activity, enabling NSW RFS and partner agencies to efficiently and accurately respond to reporting requirements. All activities can be linked to the Bush Fire Risk Management Plans, ensuring real time tracking of progress against Annual Works Plans.