



Small Business Insurance Inquiry

Savanna Burning and Indigenous Cultural Burning Issues

Submission by the Australasian Fire and Emergency Service Authorities Council (AFAC)

March, 2026





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1 Introduction

The Australasian Fire and Emergency Service Authorities Council (AFAC) welcomes the opportunity to make a submission to the Parliamentary Joint Committee on Corporations and Financial Services Inquiry into the provision, regulation, and pricing of modern insurance products for small businesses and not-for-profit and community organisations operating in Australia. The submission is based on consultation among AFAC membership as well as our broader understanding of the context of the consultation.

We ask the inquiry to note that the submission should not be taken as the position of any single AFAC member. Also, some of our members may have contributed through jurisdictional submissions, and nothing in this submission should be taken as implying that our members do not fully support their jurisdictional submissions where made.

As part of this submission, numerous documents produced by AFAC have been cited. These documents form the foundation of information used for this submission and are referenced in the text with hyperlinks where possible. AFAC takes a leading stance in the publication of industry doctrine which has been drawn on where relevant. Doctrine ranges from high-level, principles-based capstone material, through to technical guidance. Individual agencies make practical and realistic operational decisions on how they interpret this doctrine.

Further information about AFAC's members and our role within the Australian and New Zealand fire and emergency services sector is included at **Appendix 1**.

2 Executive summary

AFAC is the Australian and New Zealand Council for fire, land management and emergency service authorities. Representing 35 members and 23 affiliate members, AFAC supports approximately 288,000 firefighters and emergency workers.

This submission addresses the Terms of Reference relating to public liability insurance, and the affordability and availability of products, specifically to support the planned and proactive use of fire in the landscape, especially by Indigenous organisations.

Key points include:

- Issues affecting the affordability and availability of public liability insurance for savanna burning and emissions abatement projects as well as Indigenous cultural burning
- Details of some current and emerging initiatives that are attempting to address those issues
- The importance of proactive fire and land management, including Indigenous cultural burning, for bushfire mitigation and environmental and community outcomes
- The importance of a holistic, informed and coordinated national approach to associated policies and products



3 AFAC submission

This submission addresses the following Terms of Reference, specifically focusing on the affordability and availability of public liability insurance for organisations that use fire for tropical savanna management and emissions abatement as well as Indigenous cultural burning Australia-wide.

1. Access to insurance coverage which meets contemporary business needs, including public liability, professional indemnity, cyber threats, and business interruption;
2. The affordability and availability of these insurance products across different regions and sectors, including regional and remote Australia and high-risk industries;

AFAC supports fire agencies and other organisations in landscape fire management and prescribed burning. The National Burning Project (2011-2017) was an initiative of AFAC and the Forest Fire Management Group. It was funded by AFAC member agencies and the Commonwealth of Australia. Drawing upon the expertise of scientists, program managers, burn planners and practitioners across Australia, the project documented best practice regarding the strategic, operational and ecological aspects of prescribed burning. A suite of publications¹ provides principles, frameworks and guidelines for policy development, program design, burn planning, implementation and evaluation, including the management of risk. AFAC has a national position statement² on prescribed burning that is founded on this comprehensive body of knowledge.

AFAC convenes several collaboration groups for ongoing engagement with member agencies across Australia and New Zealand in relation to best practice in using and managing fire in the landscape. These include the AFAC Rural and Land Management Group, the AFAC National Prescribed Burning Network and the AFAC Fire Ecology Community of Practice. AFAC also participates in the North Australia Fire Managers Forum and engages with a range of non-government stakeholders across the north including Indigenous organisations.

Tropical savannas across northern Australia are a highly fire prone environment in which uncontrolled and extensive late dry season bushfires can have major economic and environmental impacts. For thousands of years, Indigenous burning effectively managed and maintained the health of these landscapes before being disrupted. Following land tenure changes under the *Aboriginal Land Rights (Northern Territory) Act 1976* and the *Native Title Act 1994*, as well as the more recent Australian Carbon Credit Units (ACCU) Scheme Savanna Burning Methodology, much of northern Australia has returned to Indigenous fire stewardship involving much cooler patchy burning conducting in the early dry season. Savanna burning projects, incentivised through carbon credits, have delivered enormous benefits for Indigenous people and communities, biodiversity and ecosystem services, and landscape-scale bushfire mitigation.

¹ AFAC National Burning Project publications <https://knowledge.aidr.org.au/resources/national-burning-project-prescribed-burning-guidelines-and-frameworks/>

² AFAC National Position on Prescribed Burning <https://www.afac.com.au/public-resources/national-position-on-prescribed-burning>



Indigenous organisations managing fire programs and carbon projects in northern Australia are required to comply with various Commonwealth and state regulations while conducting early dry season burning in a remote and relatively low risk context. They are also required to have public liability insurance. In many cases though, insurers do not understand the risk profile of the enterprise and premiums are based on the size of the area burnt. Many Indigenous organisations have found insurance products and premiums to be inappropriate and excessively priced for their operations and risk, with the cost of insurance impacting operational budgets. Developing shared understandings between Indigenous organisations and the insurance sector is needed to provide sufficient certainty for both parties that risk is being effectively appreciated and managed so that public liability insurance premiums can be priced accordingly. New and tailored insurance products might also be required.

Attempts to address this situation have made some progress but lack national coordination so far. In Western Australia, the Office of Bushfire Risk Management (OBRM) within the Department of Fire and Emergency Services has a voluntary assurance program that works with government and non-government organisations that use fire in the landscape. OBRM has successfully supported some Indigenous organisations in the Kimberley region, by applying international and Australian risk management standards as well as best practice principles and guidelines from the AFAC National Burning Project to assess their programs and practices and guide continual improvement.

Information sharing between northern stakeholders has also occurred through annual events such as the Savanna Fire Forum in Darwin, organised by the Indigenous Carbon Industry Network, and the North Australia Fire Managers Network (NAFMN), which brings together fire services, land management agencies, Indigenous organisations, conservation NGOs and pastoralists at events rotating across Queensland, Northern Territory and Western Australia. The NAFMN Forum in Broome in 2025 devoted a special session to insurance for savanna burning, led by OBRM and involving a panel comprised of insurance specialists and Indigenous fire managers. While there is no program in the Northern Territory and Queensland like that provided by OBRM, AFAC has provided some support to organisations seeking advice on best practice and risk management.

Currently OBRM is collaborating with Natural Hazard Research Australia, as well as interstate fire agencies, AFAC, Indigenous organisations and the insurance sector to prepare a proposal for researchers to develop metrics for savanna burning. These metrics are to focus on the organisational, operational and environmental aspects of burn programs and provide evidence of effective risk management.

More broadly across Australia, Indigenous-led organisations are supported by AFAC member agencies and undertake land management activities including cultural burning and prescribed burning which are essential to the future health and resilience of landscapes and communities. Many Indigenous organisations are facing similar issues to savanna carbon projects in obtaining suitable and affordable public liability insurance to support their fire, land management and cultural practices.

Future scenarios for climate change and bushfire impacts highlight the urgent need for an integrated approach to fire management that goes beyond emergency response and includes using fire for risk mitigation, emissions reduction, and ecological benefits. Prescribed burning and cultural burning



can contribute significantly to the reduction of fuel loads and bushfire intensity across all landscapes including populated and rural-urban interface areas. Reconciliation initiatives also highlight the many social and cultural benefits of Indigenous-led fire programs. Insurance needs to be an enabler, not a barrier.

While beyond the scope and focus of this submission, similar insurance issues for other organisations and contractors that use fire for bushfire mitigation across a range of land tenures are reported to be common.

Trevor Howard is the AFAC National Manager, Prescribed Burning Strategy, and can provide further information, expertise and evidence to the inquiry.



4 Appendix

4.1 AFAC membership

Emergency service members

Australian Capital Territory

ACT Emergency Services Agency
ACT Parks and Conservation Service

New South Wales

Fire and Rescue NSW
Forestry Corporation of NSW
NSW National Parks and Wildlife Service
NSW Rural Fire Service
NSW State Emergency Service
Surf Life Saving New South Wales

New Zealand

Fire and Emergency New Zealand Whakaratonga Iwi

Northern Territory

Bushfires NT
Northern Territory Emergency Service
Northern Territory Fire and Emergency Service
Northern Territory Fire and Rescue Service
Northern Territory Emergency Service
Bushfires NT

Queensland

Queensland Fire Department
Queensland Parks and Wildlife Service
Queensland Fire Department
Queensland Police Service (State Emergency Service)

South Australia

Department for Environment and Water (National Parks and Wildlife Service)
South Australian Country Fire Service
South Australian Fire and Emergency Services Commission
South Australian Country Fire Service
South Australian Metropolitan Fire Service
South Australian State Emergency Service



Tasmania

Sustainable Timber Tasmania
Tasmania Fire Service
Tasmania Parks and Wildlife Service
Tasmania State Emergency Service

Victoria

Country Fire Authority Victoria
Emergency Management Victoria
Fire Rescue Victoria
Forest Fire Management Victoria, Department of Energy, Environment and Climate Action
Victoria State Emergency Service

Western Australia

Department of Biodiversity Conservation and Attractions
Department of Fire and Emergency Services

National

Airservices Australia
National Emergency Management Agency
Parks Australia

Affiliate members

New South Wales

NSW Department of Primary Industries
NSW Environment Protection Authority
NSW Premier's Department
NSW Volunteer Rescue Association

Queensland

Brisbane City Council
HQPlantations Pty Ltd

Tasmania

Ambulance Tasmania

Victoria

Melbourne Water
Parks Victoria

National

Australasian Road Rescue Organisation
Australian Civil-Military Centre
Australian Maritime Safety Authority
Australian Red Cross
Bureau of Meteorology
Council of Australian Volunteer Fire Associations



Geoscience Australia
National SES Volunteers Association
Surf Life Saving Australia

International

Auckland International Airport – Airport Emergency Services
Department of Conservation Te Papa Atawhai New Zealand
Hong Kong Fire Services Department
National Emergency Management Agency Te Rākau Whakamarumarū New Zealand
Pacific Islands Fire & Emergency Services Association

4.2 About AFAC and its role

AFAC is the Australian and New Zealand Council for fire, land management and emergency service authorities. AFAC represents 35 members and 23 affiliate members comprising permanent and part-time personnel and volunteers, totalling approximately 288,000 firefighters and emergency workers. The list of AFAC member organisations is provided in Appendix 1.

AFAC supports the sector to create safer, more resilient communities. We drive national consistency through collaboration, innovation and partnerships. We deliver enhanced capability by developing doctrine and supporting operations. AFAC has no direct role in the delivery of services to the community. AFAC also currently plays no role in representing its members in industrial matters.

Through our [collaboration model](#), which encompasses 36 groups, technical groups and communities of practice, AFAC assists the emergency management sector to identify and achieve strategic priorities. Collaboration occurs through sharing knowledge and exchanging insights, exploring opportunities and creating solutions. This approach enables AFAC members to consider common challenges, generate solutions, develop positions and inspire new directions in practice.

AFAC's most significant intellectual property asset is a [suite of doctrine](#) publications which articulates good practice based on the knowledge and experience of our members and informed by research where it is available. It is evidence-based, constantly reviewed and vested as the official view by the AFAC National Council and sector leaders.

AFAC representatives also lead the development on many Australian and International Standards Committees. AFAC and Standards Australia are signatories to a Memorandum of Understanding in the development and revision of standards relating to the management of fire related risks, fire protection and fire safety.

AFAC Strategic Directions

AFAC's work is guided by the [Strategic Directions for fire and emergency services in Australia and New Zealand 2022-2026](#). The Strategic Directions provide the fire and emergency services sector with a shared vision and a joint commitment to enhanced community resilience. It informs, clarifies intent and identifies the actions required at a national level for fire and emergency services in Australia and New Zealand. AFAC recognises that a collaborative approach is critical to achieving the



Strategic Directions and gives fire and emergency services a national voice and broader impact, while enhancing collective capabilities.

The Strategic Directions are:

- Supporting resilient communities through risk reduction
- Providing a trusted response
- Using credible and timely information and data
- Safe, capable and diverse workforce
- Informed by knowledge, innovation and research
- Effective and transparent governance.

AFAC is the managing partner for the Australian Institute for Disaster Resilience

The [Australian Institute for Disaster Resilience](#) (AIDR) is the National Institute for disaster risk reduction and resilience. AIDR collaborates across sectors to strengthen the resilience of Australian communities to disasters. AIDR creates, grows, and supports a range of networks; provides opportunities for learning; development, and innovation; shares knowledge and resources to enable informed decision making and action; and facilitates thought leadership through national conversations. The services that AIDR delivers are defined and funded through a contract between the Australian Government National Emergency Management Agency and AFAC.

AFAC supports the National Resource Sharing Centre

AFAC established the [National Resource Sharing Centre](#) (NRSC) to develop and maintain the national Arrangement for Interstate Assistance (AIA); pursue collaboration opportunities with international jurisdictions; maintain the National Statement of Capability for Fire and Emergency Services and provide support, if requested, to jurisdictions involved in deployments. Its value has been clearly demonstrated in supporting the management of large-scale incidents by facilitating interstate and international deployments.

AFAC leads the Emergency Management Professionalisation Scheme

The Emergency Management Professionalisation Scheme (EMPS) exists to advance the cause of professionalisation in the practice of emergency management in Australia and New Zealand. Professionalisation is open to all emergency management personnel regardless of whether they are paid or volunteer, and regardless of the emergency management function they undertake. EMPS provides an excellent example of a national approach for professionalisation in the industry.

AFAC are the custodian of the Australasian Inter-service Incident Management System

The Australasian Inter-service Incident Management System (AIIMS) is the nationally endorsed system for managing incidents used by all fire, emergency service and land management agencies within Australia. AIIMS provides a common incident management system for all responding organisations and personnel, enabling seamless integration of activities and resources for the effective and safe resolution of any incident.

Through the application of AIIMS in training, exercising and incident response, people from fire and emergency services, government, not-for-profit agencies and industry have been able to build trust and confidence in each other's ability to work together and effectively manage the most challenging of incidents.



AFAC and the National Aerial Firefighting Centre

AFAC provides aerial firefighting resources on behalf of the states and territories. The National Aerial Firefighting Centre (NAFC) is a business unit of AFAC formed in 2003 by the Australian states and territories, with the support of the Australian Government, to provide a cooperative national arrangement for the provision of aerial firefighting resources for combating bushfires.

NAFC coordinates the leasing of a national fleet of specialised firefighting aircraft on behalf of state and territory emergency services and facilitates the sharing of these aircraft between states and territories during the fire season. The collaborative arrangements for the national aerial firefighting fleet have been instrumental in protecting communities and saving lives and property over past bushfire seasons.

NAFC also provides national systems to service aerial firefighting. For example, ARENA is a ground-breaking information system developed collaboratively with states and territories to support effective management and administration of the fleet.