

2009 Victorian Bushfires Royal Commission

Letters Patent issued 16 February 2009

Submissions of the Commonwealth of Australia in response to the Fire by Fire Submissions of Counsel Assisting

INTRODUCTION

1. These submissions outline the response of the Commonwealth of Australia (**the Commonwealth**) to those findings proposed in the submissions of Counsel Assisting the 2009 Victorian Bushfires Royal Commission (**the Commission**) dated 22 December 2009 (**CA Fire Submissions**) addressing eleven fires described as Delburn, Bunyip, Narre Warren, Kilmore East, Horsham, Coleraine, Pomberneit, Churchill, Murrindindi, Redesdale and Bendigo and Beechworth (**collectively, the Fires**).¹
2. The Commonwealth welcomes the opportunity to make these submissions. It acknowledges the contribution that the Commission's consideration of these issues will make to the continuous improvement of emergency management policy and practice.
3. While primary operational responsibility for emergency management rests with the States and Territories,² the Commonwealth is committed to supporting jurisdictions to prepare for, respond to and recover from all hazards,³ including bushfires.⁴ The Commonwealth will closely consider and, where appropriate, work with other governments to consider any findings the Commission makes in respect of the causes and circumstances of the Fires and any recommendations that may flow from such findings.
4. Consistent with the allocation of emergency management responsibilities between the States, Territories and Commonwealth noted in paragraph 3 above, the Commonwealth responds below to

¹Respectively Delburn (SUBM.202.001.0001), Bunyip (SUBM.202.002.0001), Narre Warren (SUBM.202.003.0001), Kilmore East (SUBM.202.004.0001), Horsham (SUBM.202.005.0001), Coleraine (SUBM.202.006.0001), Pomberneit (SUBM.202.007.0001), Churchill (SUBM.202.008.0001), Murrindindi (SUBM.202.009.0001), Redesdale and Bendigo (SUBM.202.010.0001) and Beechworth (SUBM.202.011.0001).

² Acknowledged for example, at Exhibit 45 – Statement of Pearce (WIT.032.001.0001) at [10]; 2009 Victorian Bushfires Royal Commission, *Interim Report* at 278.

³ Pearce T1410:20-T1411:25.

⁴ A summary of measures undertaken by the Commonwealth to assist jurisdictions to prepare for the 2009-10 bushfire season appears in Exhibit 485 – Hansard of Ministerial Statement of Commonwealth Attorney-General regarding forthcoming bushfire season – House of Representatives (EXH.485.003).

CA Fire Submissions collectively, by reference to seven key issues of national significance identified by the Commonwealth. These issues arise cumulatively from CA Fire Submissions and the Commission's consideration of relevant evidence in these portions of the hearings.

5. The seven key issues are:
 - a. commendation of fire-fighting and other emergency services agencies and personnel;
 - b. preparedness for 7 February 2009, including preparation and planning undertaken by Incident Management Teams (**IMTs**), emergency services agencies and municipal authorities;
 - c. use of Bureau of Meteorology (**BoM**) products and services;
 - d. aerial capability;
 - e. emergency services communications, including radio inter-operability and mobile phone coverage;
 - f. evacuation of residential aged care facilities; and
 - g. electricity assets.
6. Accordingly, the Commonwealth does not propose to comment specifically on evidence concerning individual Fires, beyond referring to the evidence and submissions of Counsel Assisting in relation to the key issues identified in paragraph 5 above. In particular, the Commonwealth does not express any views on proposed findings regarding the effectiveness of particular agencies' or individuals' preparation, planning or management in the context of the Fires.
7. In adopting this issue-based approach, the Commonwealth seeks to assist the Commission to make findings (and any subsequent recommendations) in respect of individual Fires consistent with broader emergency management policy. As a result, some information provided by the Commonwealth in these submissions is not yet directly supported by material in evidence before the Commission. The Commonwealth is able to provide further information to the Commission if appropriate.
8. The Commonwealth further understands that the Commission will seek submissions on nominated systemic issues later in 2010. Consequently, these submissions briefly identify and refer to key

evidence concerning connections to broader matters of policy arising from the Fires. The Commonwealth will provide more detailed analysis of these matters, and other issues of national significance, in subsequent submissions on systemic issues as necessary.

COMMENDATION OF FIRE-FIGHTING AND OTHER EMERGENCY SERVICES AGENCIES AND PERSONNEL

9. The Commonwealth supports the proposed findings in CA Fire Submissions commending the efforts of Victorian fire-fighting and other emergency services agencies and personnel.⁵
10. The Commonwealth further acknowledges and commends those agencies and personnel from other jurisdictions, as well as volunteers, private individuals and communities that provided support in the response, relief and recovery efforts arising from the Fires.

PREPAREDNESS FOR 7 FEBRUARY 2009, INCLUDING PREPARATION AND PLANNING

11. The proposed findings in CA Fire Submissions identify varying levels of preparation and planning for the events of 7 February 2009 by IMTs, emergency services agencies and local governments.⁶ While the Commonwealth does not express a view on the appropriateness of these individual findings, overall it is apparent that effective preparation and planning for bushfire emergencies directly and significantly contributes to the effectiveness of emergency responses.⁷ The Commonwealth supports this broad proposition and reiterates its commitment to assisting States and Territories to continuously improve their preparedness for emergencies including bushfires. The Commonwealth further notes that effective preparedness requires coordinated preparation and planning within and among all levels of government, the private sector, the community and individuals.
12. Evidence is before the Commission of key Commonwealth initiatives that are available to support the States and Territories through the 2009-10, and subsequent, bushfire seasons.⁸ On 21 December

⁵ For example, see paragraph 5.1(ii) of Delburn Submissions; paragraph 10.1(xiii) of Bunyip Submissions; paragraphs 10.4 and 10.5 of Narre Warren Submissions; paragraphs 13.3(xvi) and 13.3 (xvii) of Churchill Submissions; paragraph 8.10 of Pomorneit Submissions; paragraph 13.25 of Murrindindi Submissions; and paragraph 23.3 of Redesdale and Bendigo Submissions.

⁶ For example, see paragraphs 10.1(i) to (vii), 10.1 (xvii) and 10.1 (xxi) of Bunyip Submissions; paragraphs 10.5 and 10.7 of Narre Warren Submissions; paragraphs 11.6 to 11.11, 11.3 to 11.15 and 11.22 of Kilmore Submissions; paragraphs 5.5 to 5.9 and 5.36 to 5.49 of Horsham Submissions; paragraphs 5.7 to 5.21, 7.1 to 7.12 and 10.7 of Coleraine Submissions; paragraphs 8.11 to 8.15 of Pomorneit Submissions; paragraphs 13.2 to 13.3 of Churchill Submissions; paragraphs 13.2 to 13.3, 13.5, 13.7, 13.12 to 13.14, 13.21 and 13.23 of Murrindindi Submissions; paragraphs 11.7, 23.2, 23.8 and 23.10 of Redesdale and Bendigo Submissions; and paragraphs 10.6 and 10.7 of Beechworth Submissions.

⁷ A proposed finding to this effect is made, at paragraph 11.15 of Kilmore Submissions.

⁸ For example, Exhibit 485 – Hansard of Ministerial Statement of Commonwealth Attorney-General regarding forthcoming bushfire season – House of Representatives (EXH.485.003).

2009, the Commonwealth filed with the Commission a statement outlining key bushfire (and other natural disasters) related initiatives the Commonwealth has implemented since the Commission was established.⁹ This statement contains material describing national measures to improve disaster resilience generally, including preparedness.¹⁰ Key national initiatives include:

- a. the agreement of the Council of Australian Governments (**COAG**)¹¹ to the development by a new National Emergency Management Committee of a comprehensive National Disaster Resilience Strategy by the end of 2010, to integrate the principles of resilience into aspects of natural disaster arrangements. It will include support measures to strengthen communities, individuals, businesses and institutions to minimise the adverse effects of disasters on Australia;¹² and
- b. the development of a National Disaster Resilience Framework which may form the basis of the Natural Disaster Resilience Strategy.¹³ The Framework was endorsed by the Ministerial Council on Emergency Management – Emergency Management (**MCPPEM-EM**) on 20 November 2009.¹⁴

USE OF BOM PRODUCTS AND SERVICES IN THE 2009 VICTORIAN BUSHFIRES

13. Timely and accurate weather forecasts are a significant component of bushfire preparedness and response efforts. CA Fire Submissions have identified the importance of weather information to the protection of life and property in the individual Fires. Such information is critical to decisions about the location of containment and suppression efforts, the allocation of resources and the provision of warnings.¹⁵

⁹ Statement of Popple (WIT.6006.001.0001) (to be tendered).

¹⁰ Statement of Popple – Attachment JP-3 (WIT.6006.001.0001) at 0019 (to be tendered)lcindie.

¹¹ **Annexure 1** – COAG Communiqué, 7 December 2009.

¹² Further information on the Strategy appears in the statement of Popple – Attachment JP-3 (WIT.6006.001.0001) at 0019 (to be tendered).

¹³ Statement of Popple - Attachment JP-3 (WIT.6006.001.0001) at 0019 (to be tendered).

¹⁴ Statement of Popple – Attachment JP-3 (WIT.6006.001.0001) at 0019 (to be tendered); See further **Annexure 2** – MCPPEM-EM Natural Disaster Resilience Framework, 20 November 2009).

¹⁵ For example, see the proposed findings suggested by Counsel Assisting at paragraphs 10.1(vi) and 10.1(xv) in Bunyip Submissions; paragraphs 8.9 and 8.14 in Pomborneit Submissions; paragraphs 13.3(ii) to 13.3(xii) in Churchill Submissions; paragraphs 13.6 to 13.10 in Murrindindi Submissions; paragraphs 11.5, 23.2 and 23.11 in Redesdale and Bendigo Submissions and paragraphs 10.2 to 10.4 Beechworth Submissions.

Role of BoM in the provision of fire weather information

14. CA Fire Submissions contain various references to the role of BoM in the provision of fire weather forecasts and other information to IMTs in the Fires.¹⁶
15. There is also evidence before the Commission about the broader context in which BoM products and services are provided to relevant State agencies. This includes evidence about the following matters:
- a. the statutory framework and operational arrangements through which BoM products and services are provided to emergency services and support agencies,¹⁷ including arrangements for:
 - (i) the transmission of routine forecasts and special fire weather warnings and services from the Regional Forecast Centre, which operates a dedicated fire weather forecasting shift during the fire season;¹⁸
 - (ii) the assignment of dedicated BoM meteorologists to the State Control Centre (SCC)¹⁹ each fire season to facilitate regular contact and consultation between meteorologists and fire agencies;²⁰ and
 - (iii) the outposting of BoM meteorologists to ICCs on request;²¹
 - b. the range of routine and special products and services available to IMTs, including detailed Spot Fire Weather Forecasts (SFFs) on request;²²
 - c. BoM representation on various State emergency management committees;²³ and

¹⁶ For example, see paragraphs 6.25 to 6.33 and section 3 generally of Bunyip Submissions; section 3 generally of Horsham Submissions; paragraphs 4.1 to 4.7 of Coleraine Submissions; paragraphs 2.1 to 2.4 and 8.6-8.7 of Pomborneit Submissions; paragraphs 2.20-2.37 of Churchill Submissions; paragraphs 3.1 to 3.13 of Murrindindi Submissions; sections 3 and 14 generally of Redesdale and Bendigo Submissions; and section 2 generally of Beechworth Submissions.

¹⁷ Exhibit 22 – Statement of Williams (WIT.013.001.0002) at [9]-[25]; Exhibit 22 – Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0023 to 0027.

¹⁸ Exhibit 22 – Statement of Williams (WIT.013.001.0002) at [10] to [12]; Exhibit 22 – Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0024 and 0026 to 0027.

¹⁹ Formerly, the IECC - Overland T10052:8 to T10052:9.

²⁰ Exhibit 22 – Statement of Williams (WIT.013.001.0002) at [12] to [13]; Exhibit 22 – Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0024 and 0027; Williams T717:9 to T717:16.

²¹ Exhibit 22 – Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0027, but note that the placement of BoM meteorologists within the IECC (now SCC) is regarded as the most effective means of coordination and placement at ICCs is considered most useful in the case of campaign fires burning over an extended period of time.

²² Exhibit 22 – Statement of Williams (WIT.013.001.0002) at [10] to [11]; Exhibit 22 – Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0023 to 0027; Williams T757:27 to T758:15 (role of SFFs); and Esplin T511:19 to T511:20 (role of SFFs).

- d. BoM participation in pre- and post-season fire agency meetings.²⁴

IMTs' utilisation of weather information

16. CA Fire Submissions contain several proposed findings about IMTs' use of BoM products and services on 7 February 2009.²⁵ Overall, these proposed findings suggest varying levels of understanding of the availability, utility and content of SFFs.
17. Although the Commonwealth does not seek to comment on particular proposed findings in CA Fire Submissions about the performance of individual IMTs or personnel, it notes in a general sense the importance of a thorough awareness and understanding of available BoM products and services.
18. In this respect, there is evidence before the Commission of measures introduced following the 2009 Victorian bushfires to improve agencies' awareness and understanding of BoM products and services, in particular:
- a. the participation of BoM in annual Commonwealth Pre-Season Operational Briefings to jurisdictions (both collectively, and through jurisdiction-specific briefings). The inaugural national briefing was held on 25 September 2009, at which BoM provided information on seasonal weather outlooks and support available to jurisdictions;²⁶ and
 - b. the incorporation of information into BoM fire weather warnings, namely revised Fire Danger Indices and Fire Danger Ratings and the new Fire Danger Scale, and action statements agreed by State and Territory fire agencies.²⁷
19. Pre-Season Operational Briefings will be reviewed on an ongoing basis to ensure that the information provided is useful to participating State agencies. The Commonwealth will consider closely any future findings and recommendations relevant to the ongoing development of these annual briefings, including in relation to fire-weather products and services.

²³ Exhibit 22 – Statement of Williams (WIT.013.001.0002) at [7].

²⁴ Exhibit 22 – Statement of Williams (WIT.013.001.0002) at [7].

²⁵ For example, see paragraphs 10.1(vi), 10.1(xii) and 10.1(xv) of Bunyip Submissions; paragraph 8.14 of Pomorneit Submissions; paragraphs 13.3(ii), 13.3(iii), 13.3(iv) to (v), 13.3(ix), 13.3(xi) to (xii) of Churchill Submissions; and paragraphs 13.6 to 13.9 of Murrindindi Submissions.

²⁶ Statement of Popple - Attachment JP-3 (WIT.6006.001.0001) at 0037 to 0038 (to be tendered); Media Release of Attorney-General dated 25 September 2009 (**Annexure 3**)

²⁷ Statement of Popple - Attachment JP-3 (WIT.6006.001.0001) at 0037 to 0038 (to be tendered).

20. The Commonwealth is able to provide information on further relevant initiatives undertaken by BoM if this would assist the Commission.

Accuracy of references to evidence relating to BOM and weather in CA Fire Submissions

21. Paragraph 7.5 of Murrindindi Submissions refers to the BoM as being a member of the Murrindindi Municipal Emergency Management Planning Committee. This is not correct. Whilst the BoM provided information and advice to that Committee to develop the Municipal Emergency Management Plan²⁸, its members do not include the BoM.²⁹

22. Various references are made in CA Fire Submissions to the weather prior to and on 7 February 2009, including data recorded or reported by BoM, particularly about wind conditions. In some instances, references to secondary evidence have resulted in minor discrepancies with the data held by BoM. For example, it appears that some times and other data may have been incorrectly rounded when transferred from source documents. **Annexure 4** contains a list of proposed corrections and alternative references to assist the Commission make findings based on the best available evidence.

23. In other respects, the Commonwealth agrees with the summary of the weather conditions in CA Fire Submissions. As a general matter it is noted that prior to and on 7 February 2009, BoM provided accurate, useful and timely information to fire agencies and ensured that weather updates were regularly provided to fire agencies at the IECC and various ICCs.³⁰

AERIAL CAPABILITY

24. CA Fire Submissions identify the effectiveness of aerial capability as part of a broad suite of measures for the detection, tracking, management, containment and suppression of bushfires.³¹

25. The Commonwealth supports this broad proposition and will continue to assist the States and Territories where appropriate with suitable resources for aerial fire-fighting and tracking. Such assistance includes:

²⁸ Exhibit 377 - Statement of Ellett (WIT.4006.001.0001) at [21].

²⁹ Exhibit 377 - Statement of Ellett (WIT.4006.001.0001) at [22].

³⁰ A summary of the information updates provided by BoM staff prior to and on 7 February 2009 is contained in Exhibit 22 – Statement of Williams, Annexure 1 (WIT.013.001.0012) at 0066 to 0078.

³¹ For example, see paragraph 5.1(iii) of Delburn Submissions; paragraphs 10.1(viii) and 10.1(xi) of Bunyip Submissions; paragraphs 2.9, 2.12, 3.7 and 8.16 of Narre Warren Submissions; paragraphs 4.5 to 4.6 of Kilmore Submissions; paragraph 10.7 of Coleraine Submissions; paragraph 17.9 of Redesdale and Bendigo Submissions; and paragraph 10.4 of Beechworth Submissions.

- a. Commonwealth financial assistance for the National Aerial Fire-Fighting Centre to coordinate the procurement of commercially available assets on behalf of the States and Territories and investigate new technologies for aerial fire-fighting, pursuant to the National Aerial Fire-Fighting Arrangements;³² and
- b. the provision of Commonwealth assets to provide aerial support such as fire tracking, including under COMDISPLAN³³ and DACC³⁴ arrangements.

Aerial capability can make an important contribution to bushfire detection and suppression and should be used as part of an integrated fire-fighting strategy taking into account its limitations.³⁵

EMERGENCY SERVICES COMMUNICATION ISSUES – RADIO INTER-OPERABILITY AND MOBILE PHONE COVERAGE

26. CA Fire Submissions identify technical communication difficulties encountered by various IMTs and emergency services agencies on 7 February 2009. These include issues relating to the inter-operability of radio equipment³⁶ and mobile phone coverage.³⁷ The Commonwealth is able to provide further information on the issue of emergency services communications as follows.

Radio inter-operability

27. The inter-operability of radio communications equipment is primarily the responsibility of individual States and Territories. However, the issue has been considered at a national level through COAG. In 2009 the COAG Natural Disasters Working Group considered a national approach to improving the

³² Statement of Popple – Attachment JP-3 (WIT.6006.001.0001) at 0024 (to be tendered). Further evidence about the National Aerial Fire Fighting Arrangements is contained in the statement of Pearce (WIT.032.001.0001) at [16]-[22]; Exhibit 84 – Statement of Brown (WIT.023.002.001) at [22]; Brown T2951:16 to T2951:21; Edwards T871:28 to T2872:4; and Rogers T10578:1 to T10578:6.

³³ Exhibit 45 – Statement of Pearce (WIT.032.001.0001) at [25]-[30]; Pearce T1407:12-T1410:12, T1418:22-1418:31, and T1480:20-T1481:21.

³⁴ Exhibit 45 – Statement of Pearce (WIT.032.001.0001) at [31]-[32]; Exhibit 502 – Statement of Power (WIT.6002.001.0001) at [8]-[11] and Attachment 1 (WIT.6002.001.0076). Note the operational limitations on ADF aircraft and capability in relation to Defence assistance under both DACC and COMDISPLAN arrangements: Exhibit 502 – Statement of Power (WIT.6002.001.0001) at [20]-[25]; Power T10817:25-T10817:28, T10818:8-T10819:23.

³⁵ For example limitations may be specific to the type of aircraft (Sijepcevic T6323:26 to T6323:29; Nichols T6617:11-T6617:16) or arise from smoke, weather conditions and terrain (Exhibit 309 - Statement of Fallon (WIT.3004.015.0001) at [128]; Paterson T4334:18 to T4334:24; Warrington T6666:19-T6666:23; Sewell 9731:27-T9731:29; O’Toole T9565:12 to T9565:14). There is also some doubt as to whether aerial support could have impeded the progress of fires on 7 February 2009: see O’Toole T9570:22 to T9570:31 and T9571:13 to T9572:15 (Churchill), Lawlor T7278:17 to T7281:10 (Beechworth).

³⁶ For example, see paragraph 10.13 of Kilmore Submissions; and paragraph 13.31 of Murrindindi Submissions.

³⁷ For example, see paragraphs 6.22 to 6.24 of Bunyip Submissions; and paragraphs 10.1(b) to (c), 11.8 and 16.8 of Redesdale and Bendigo Submissions.

inter-operability of radio communications equipment used by emergency services agencies. On 7 December 2009, COAG endorsed a national Framework setting out guiding principles and key areas of work to assist jurisdictions to upgrade their domestic radio communications equipment to nationally inter-operable systems, modes and frequencies, by 2020.³⁸

28. The Commonwealth will support the work of the States and Territories through the National Coordinating Committee for Government Radio Communications (**NCCGRC**), which comprises representatives from relevant State, Territory and Commonwealth government agencies together with observers from law enforcement, security and public safety organisations. The NCCGRC is working with jurisdictions to develop an implementation plan to adopt the principles and actions outlined in the Framework and will report to COAG annually.

Mobile phone coverage

29. The Commonwealth understands that the Commission may consider issues associated with mobile phone coverage and communications more broadly in future hearings, and is willing to provide further evidence on relevant matters. These include the Universal Service Obligation regime to ensure the accessibility of standard telephone services across Australia,³⁹ and the progress of current initiatives relating to communications in the event of emergencies.
30. The Commonwealth acknowledges that limitations exist upon mobile phone coverage across Australia.⁴⁰ Terrestrial (as opposed to satellite) mobile phone services are accessible across approximately 25 per cent of the Australian landmass. Services are provided through networks of mobile phone transmitter/receiver stations.⁴¹ In regional areas, these mainly comprise mobile phone base stations, capable of providing services out to a distance of around 30km in ideal terrain. There are a number of factors that can interfere with mobile reception within the radius of a base station and therefore affect a user's ability to obtain or maintain a mobile phone signal at any given

³⁸ **Annexure 1** – COAG Communique, 7 December 2009. See further **Annexure 5** – COAG Natural Disasters Working Group, National Framework to Improve Government Radio Communications Interoperability.

³⁹ *Telecommunications (Consumer Protection and Service Standards) Act 1999* (Cth) s 9.

⁴⁰ For example, see paragraphs 6.22 and 6.24 of Bunyip Submissions; and paragraphs 10.1(b) to 10.1(c), 11.8 and 16.8 of Redesdale and Bendigo Submissions.

⁴¹ Some evidence describing the terrestrial cellular network is contained in Exhibit 119 - Statement of Jennings (WIT.5004.001.0001) at [11]

time or in any particular place. These factors include mountainous or hilly terrain, road cuttings, buildings and tunnels.⁴²

31. Evidence has been provided to the Commission of two relevant initiatives to improve mobile phone communications in emergencies:
- a. Commonwealth funding of \$6.8 million over two years for the continuation and upgrade of the Wireless Priority Service System (**WPSS**), which substantially improves the probability of mobile call completion for key decision-makers during a crisis event when telecommunications networks are typically congested;⁴³ and
 - b. Commonwealth subsidies to assist those (including individuals and emergency services agencies) who live or work in areas without standard (terrestrial) mobile phone coverage to purchase satellite phone handsets.⁴⁴

EVACUATION OF RESIDENTIAL AGED CARE FACILITIES

32. The Commonwealth notes those proposed findings in CA Fire Submissions addressing the evacuation of residential aged care facilities on 7 February 2009.⁴⁵ In particular, the Commonwealth supports the proposed recommendation at paragraph 10.1(xxiii) of Bunyip Submissions, recognising the importance of establishing detailed and comprehensive evacuation plans in residential aged care facilities in advance of the fire season.
33. The Commonwealth further submits that while model plans may provide preliminary guidance to aged care providers,⁴⁶ it is important that all bushfire evacuation plans are developed to take account of providers' and facilities' individual circumstances and obligations.
34. Evidence has been provided to the Commission outlining assistance provided by the Commonwealth Department of Health and Ageing (**DoHA**) to build the capacity of approved providers of residential aged care to plan for and respond to emergency events.⁴⁷ This includes the provision of advice and assistance in relation to preparation for and responses to emergency events within the existing

⁴² Some factors are described in Exhibit 119 - Statement of Jennings (WIT.5004.001.0001) at [30].

⁴³ Statement of Popple – Attachment JP-3 (WIT.6006.001.0001) at 0033 (to be tendered).

⁴⁴ Statement of Popple – Attachment JP-3 (WIT.6006.001.0001) at 0040 to 0041 (to be tendered).

⁴⁵ For example, paragraphs 8.1 to 8.40 and 10.1(xx) to (xxv) of Bunyip Submissions; and paragraph 4.2 of Churchill Submissions.

⁴⁶ As proposed at paragraph 10.1(xxiv) of Bunyip Submissions.

⁴⁷ Statement of Popple – Attachment JP-3 (WIT.6006.001.0001) at 0071 to 0072 (to be tendered).

regulatory and legislative aged care framework, and the identification of alternative facilities in the event of evacuation.⁴⁸

35. The Commonwealth is able to inform the Commission that DoHA has engaged in the following initiatives in Victoria since 7 February 2009:

- a. collaboration with the Victorian Department of Health (**VDH**) to:
 - (i) develop bushfire ready resources for residential aged care providers;
 - (ii) participate in VDH regional emergency planning workshops; and
 - (iii) establish a protocol for liaison between DoHA and VDH in the event of the activation of the VDH/DHS Emergency Coordination Centre; and
- b. collaboration and liaison with approved providers of residential aged care in Victoria including:
 - (i) distributing relevant information to providers, including advice about a dedicated 1800 Emergency Advice and Response Line operated by DoHA in Victoria, and emergency response information sheets;
 - (ii) contacting Commonwealth-funded residential aged care facilities in the 52 identified high fire-risk areas to ascertain bushfire readiness; and
 - (iii) establishing a protocol for email contact with facilities when code red warnings are issued.

The Commonwealth is able to provide further detail of these initiatives if this would assist the Commission.

ELECTRICITY ASSETS

36. The Commonwealth understands that issues relating to electricity assets, including safety considerations, will be addressed in subsequent submissions on systemic electricity issues. Accordingly, the Commonwealth will respond to this issue in later submissions.

⁴⁸ Statement of Popple – Attachment JP-3 (WIT.6006.001.0001) at 0071 to 0072 (to be tendered)

37. The Commonwealth reserves its position in respect of paragraph 10.18 of Beechworth Submissions, which proposes consideration of alternative and complementary strategies to manage the challenges associated with vegetation management around powerlines.

27 January 2010

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