

21 August 2023
DEECA

Via email: firestrategy@delwp.vic.gov.au

Dear Sir/Madam

VICTORIA'S BUSHFIRE MANAGEMENT STRATEGY - DRAFT

Introduction

CMPA is the premier representative body for the Victorian extractive resources industry. It represents a broad spectrum of those involved in construction material processing businesses and has a membership base consisting of over 200 quarries across the industry. Together, these members employ approximately 2000 Victorians which underpins the construction industry of almost 240,000 employees (<https://liveinmelbourne.vic.gov.au/connect/victorian-industries/transport-defence-and-construction>).

CMPA members are typically small to medium sized family and private businesses, local government, utility providers and some public corporations. Many are regionally based employers and service local construction, infrastructure and road maintenance needs. The extractives sector is a key pillar within the construction industry underpinning the growth and economic development of Victoria through supply of the construction materials.

In 2021/22, the sector supplied approximately 70 million tonnes of construction materials (25% of total freight movement in Victoria) to the market, at a value of approximately \$1.2 billion directly supporting Victoria's \$80 billion Big Build (<https://bigbuild.vic.gov.au/about>) and the estimated 1.6 million new homes required by 2050 (<https://earthresources.vic.gov.au/geology-exploration/industry-investment/joint-ministerial-statement-on-extractive-resources>). Small to medium quarries account for approximately half of this production and is submitted to be a vital industry supporting the ongoing economic prosperity of Victorians.

The CMPA supports the principle of responsible, balanced legislation that is in the best interests of the State of Victoria and Australia including the protection of resources that enable extraction of construction materials that is cost efficient to market and to the Victorian taxpayer who is ultimately the end consumer and beneficiary of that resource.

Discussion

Many quarries are in rural and regional Victoria and are required to prepare Fire Response and Readiness Plans as a condition of their licence to operate. CMPA has produced a Bushfire Response and Readiness Plan Template 2020 with input from the CFA to assist Members with their responsibilities.

The objective of the Bushfire Response and Readiness Plan Template (<https://cmpavic.asn.au/>) is to assist CMPA members in ensuring that procedures are in place and that responsibilities are defined and understood to prevent the ignition of a bushfire on a quarry site and or to reduce the impact of an encroaching bushfire.

Comments

It is noted that People and Community Safety is the 1st strategy. However, it is difficult to align “Aboriginal self-determination in cultural fire and bushfire management” strategy with the People and Community Safety strategy as stated on p.11. Especially where cultural fire practice may not have outcomes that increase bushfire management resilience and “While the application of cultural fire may reduce bushfire risk; this is **rarely its primary objective**” p.40.

The Tinbergen Rule, named after one of the first two Nobel laureates in economics, is a basic principle of effective policy. Distinguishing between policy targets, on the one hand, and policy instruments, on the other hand, Tinbergen (1952) argued that to successfully achieve n independent policy targets at least the same number of independent policy instruments are required.

CMPA Members generally undertake progressive rehabilitation as part of their licences to operate (Work Authorities). This leads to vast investments in planting and establishing native flora indigenous to the area in which the quarries, usually on private land, are situated.

Submission

The CMPA supports Victoria’s bush fire management strategy in part. Bushfires, unless managed with extreme caution, lead to devastating impacts on society, the environment and economy of Victoria. However:

- The strategy appears to become misaligned when considering Aboriginal self-determination in cultural fire and bushfire management. As per the Tinbergen Rule a separate policy instrument is required because of two very different policy targets:
 1. Bushfire management resilience.
 2. Aboriginal self-determination in cultural fire: a socially and ecologically complex practice governed by kinship, eldership, spiritual connections to Country and environmental interactions with fire.
- That Extractive Industries Work Authorities be exempt from Aboriginal self-determination in cultural fire due to the regulatory requirement for bush fire response and readiness; and progressive rehabilitation.

I would be pleased to discuss these matters with you. Please contact me on 0434 692 618 or via email at elizabeth.gibson@cmpavic.asn.au in respect of any matter.

Yours sincerely



Dr Elizabeth Gibson
General Manager

About the CMPA

The CMPA Rules contain the following purposes of the Association which are to:

- (i) conduct its affairs with honesty and integrity;
- (ii) demonstrate its commitment to the:
 - viability of the Industry;
 - protection of the environment;
 - community in which it exists;
- (iii) vigorously pursue with government and others issues of widespread concern to members;
- (iv) demonstrate leadership and a sense of direction for the Industry;
- (v) act as a resource and provide support to its members through the delivery of cost savings and assistance in complying with legal obligations;
- (vi) foster unity and cooperation between members and others;
- (vii) promote continuous improvement through education, training and other activities.

As per purpose (vii) through the development of Guidelines, Checklists and Reference Manuals such as:

Guidelines	Checklists	Reference Manuals	Community publications and video clips
Workplace and Environmental Noise Management	Excavator	Work Safely	Quarries Building Communities https://cmpavic.asn.au/community/
Dust Management including separate Respirable Crystalline Silica Dust Management	Front End Loader	Conduct Laboratory-based tests	
Blast Management	Mobile Plant	Conduct Screening	
Bushfire Response	On Road Tip Truck	Service & Maintain Crushers	
Slimes Management	Watercart	Conduct Crushing	
Traffic Management	Haul Truck	Collect Routine Site Samples	
Working Safely with Geotechnical Risk in Quarries	Pick up and delivery	Combined Crushing & Screening	

The Guidelines are made available **free to the community** on <https://cmpavic.asn.au/publications/support-sheets/>