

30th November 2023



Tasmania Fire and Emergency Service Bill
GPO Box 123
Hobart TAS 7001
BY EMAIL ONLY: FES.Reform@dpfem.tas.gov.au

TO WHOM IT MAY CONCERN

RE: TFGA Submission - Draft Tasmania Fire and Emergency Service Bill 2023 and funding options paper

The Tasmanian Farmers and Graziers Association (TFGA) is the peak representative body for Tasmanian primary producers. Agriculture is crucial to Tasmania's economy and TFGA is committed to ensuring the sector remains profitable and sustainable. TFGA has previously made submissions to the ongoing fire and emergency service reforms. We welcome the opportunity to provide feedback on the draft *Tasmania Fire and Emergency Service Bill 2023* and the associated funding options paper.

The farming sector and broader rural community play a pivotal role in supporting the Tasmania Fire Service. Across Tasmania, around 5,000 volunteer firefighters operate out of over 200 local brigades¹. Most of these volunteers are farmers, landholders, and community members across Tasmania's prominent agricultural areas. Rural communities hold a breadth of local knowledge and are actively involved in firefighting as required. With approximately 22%² of Tasmania comprised of agricultural land, it is crucial that the full impact of this bill and funding model on producers is thoroughly reconsidered.

General Comments

TFGA recognises and supports the need for a strong emergency service structure however, we strongly believe that farmers and rural communities are already contributing disproportionately to this area both in kind and financial terms. Farmers continually offer their time, money, and significant resources to undertake fire management on their own properties and assist others through fuel reduction, maintaining fire breaks, implementing farm fire plans and being volunteer firefighters.

Farmers are not financially compensated nor formally recognised for these contributions and their sacrifice often means they lose income as their staff are called away to respond to fires with local brigades. To rub salt into the wound, farmers are also paying the current fire service levies. Clearly farmers are a major source of support to the Tasmania Fire Service and the safety of all Tasmanians.

Considering the total of these contributions, it is clear that the volunteer firefighting sector is heavily subsidised by the farming and rural sector. TFGA and its members believe everyone should contribute financially to emergency services however, this payment must be fair, transparent, and equitable. The TFGA's view is firefighting is an essential service just like schools, roads and ambulances and believe the proposed Tasmania Fire and Emergency Service (TFES) should be funded in a similar manner, with most of the funding coming from consolidated revenue.

¹ Reference: <https://www.fire.tas.gov.au/volunteering/>

² Reference: <https://dbr.abs.gov.au/region.html?lyr=ste&rgn=6>



While TFGA supports the streamlining of the Tasmania Fire Service and the State Emergency Service, the proposed legislation is broad with little clarity around actions, structure, or governance, and it would seem the fine tuning will be left to the regulations. This is a retrograde step as it does not provide clarity, certainty, or consistency which could leave the government open to legal actions and does not encourage strategic long-term actions.

Vegetation covers the majority of Tasmania and provides a variety of benefits for both farmers and the community, including ecosystem services, forests for environmental outcomes and timber production, soil retention, conservation, carbon storage, riparian restoration, and shelterbelts for stock among other benefits. The TFGA is concerned under the proposed bill there will be no point of contact for farmers or land managers to have direct input into how vegetation is managed for its multiple uses which we see as a backward step.

Draft Tasmania Fire and Emergency Service Bill 2023

TFGA has several concerns regarding the governance and structure of the new TFES. Currently, TFGA has representation on the State Fire Management Council (SFMC) which reports directly to the Minister. Under the proposed bill there is no indication that TFGA or indeed any other land managers will have this level of, or any representation. The SFMC is the only body that represents both public and private landholders and provides access to all major land managers across fire management in Tasmania.

Without this direct line of communication TFGA fears information to the Minister will not be relayed as efficiently, leading to reduced outcomes for the communities that rely on these services. TFGA strongly believes there must be a management structure that is contemporary, and any council, or board has a focus on being skills based, as to fall towards a sectorial board will be a lost opportunity.

TFGA highlights that there has been limited consultation with relevant stakeholders and most importantly no consultation with the state's largest landholders prior to the release of the bill and funding model. Involving key stakeholders throughout the development of the bill and funding model should have been undertaken. There has been no indication of any support that will be provided throughout the transition to an increased property-based levy. We strongly believe this needs to be addressed before the bill or funding model is progressed further to ensure levy payers are given the opportunity to provide input.

Recommendation:

1. There be a body with roles and responsibilities described in the legislation, like SFMC, to advise on vegetation fire management on both public and private land.
2. A skills-based board is put in place to oversee the strategic implementation of TFES.

Options Paper- Funding Model

TFGA strongly opposes and refuses to accept the two proposed options outlined in the funding model options paper. They are unfair, inequitable, and unsustainable. Our position is that farmers pay the same in levies as they pay now, or less. Both proposed options will see a major increase in the fire service levy contribution of primary producers. After consultation with our members for option 1 this increase would be on average \$7500 (250% increase) while for option 2 this increase would be on average \$2500 (80%). For most farmers, these increases will be in the thousands of dollars. We also strongly believe that landholders should not be disproportionately affected due to the larger size and value of their properties.



The proposed streamlined property-based levy will have substantial impacts on farming communities, a sector already struggling with increasing on-farm costs and significant falls in commodity prices.

TFGA believe farmers should not be burdened with this extra cost considering their current expenditure of time and money in their volunteer firefighting roles. Farmers are also actively involved in conducting extensive bushfire mitigation on their properties including financial investment to maintain their own on-farm firefighting units. By maintaining their own firefighting infrastructure, farmers are decreasing their reliance on external firefighting services, which TFGA believe should be reflected with a decreased fire levy in the new funding model.

There is also concern over the use of a property’s assessed annual value (AAV) to calculate the property-based levy. Some farmers have highlighted that their AAV has not been updated for several years and with recent increases in the value of agricultural land, this could lead to even greater levy increases than first predicted. The use of AAV in calculating the fire service levy contribution means that farmers will be paying more, purely because of the size of their property. This measure does not take into account farmers’ continued expenditure on private firefighting operations. TFGA believe consideration should be given to a reduced or subsidised fire levy to farmers who are already providing their support to firefighting operations.

Consultation with farmers across Tasmania has unveiled large monetary increases if either of the proposed funding models go ahead. Data has been obtained and collated from a range of farmers across the state demonstrating the extent to which their fire service levy would increase.

Recommendation:

1. For primary producers, the fire levy contribution should remain the same or be reduced to reflect farmers’ existing fire management contributions.

Data from Farmers

This graph shows a number of producer’s current property-based levy and the potential property-based levy under options 1 and 2 in the proposed funding model.

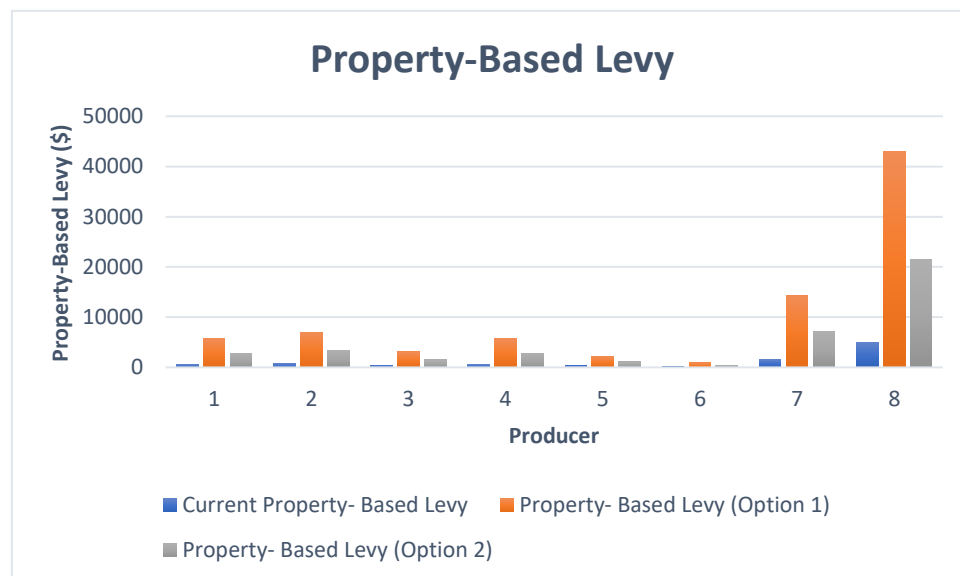


Figure Current

1.

Property-based fire levy compared to the potential property-based fire levy under the proposed funding model.

This graph shows the percentage increase from each producer’s current property-based levy to the potential property-based levy under options 1 and 2 in the proposed funding model.

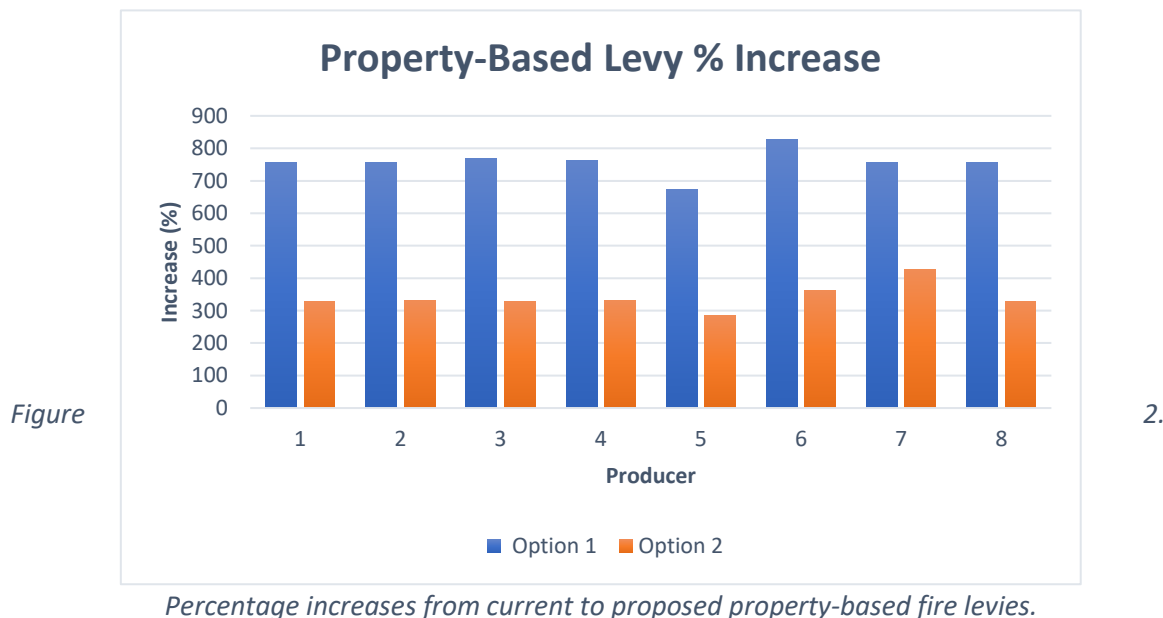


Table 1. Each producer’s current property-based levy and the potential property-based levy under options 1 and 2 in the proposed funding model.

Producer	Current Property-Based Levy	Property-Based Levy (Option 1)	Property-Based Levy (Option 2)	Increase (Option 1)	Increase (Option 2)
1	\$666	\$5712	\$2856	\$5046 (757%)	\$2190 (328%)
2	\$806	\$6905	\$3453	\$6099 (756%)	\$2647 (331%)
3	\$362	\$3100	\$1550	\$2738 (768%)	\$1188 (328%)
4	\$660	\$5700	\$2856	\$5040 (763%)	\$2196 (332%)
5	\$286	\$2208	\$1104	\$1922 (672%)	\$818 (286%)
6	\$101	\$936	\$468	\$835 (826%)	\$367 (363%)
7	\$1666	\$14280	\$7140	\$12614 (757%)	\$5474 (428%)
8	\$5014	\$42984	\$21492	\$37970 (757%)	\$16478 (328%)

This graph shows each producer’s current total fire levy, which is the insurance levy and the property-based fire levy combined, compared to the potential property-based levy under options 1 and 2 in the proposed funding model.

The Tasmanian Government has suggested that the increase in the property-based levy will be less if farmers disregard their insurance levy as this will be abolished. This graph shows the increase after the insurance levy has been removed showing there is still a substantial increase for primary producers regardless.

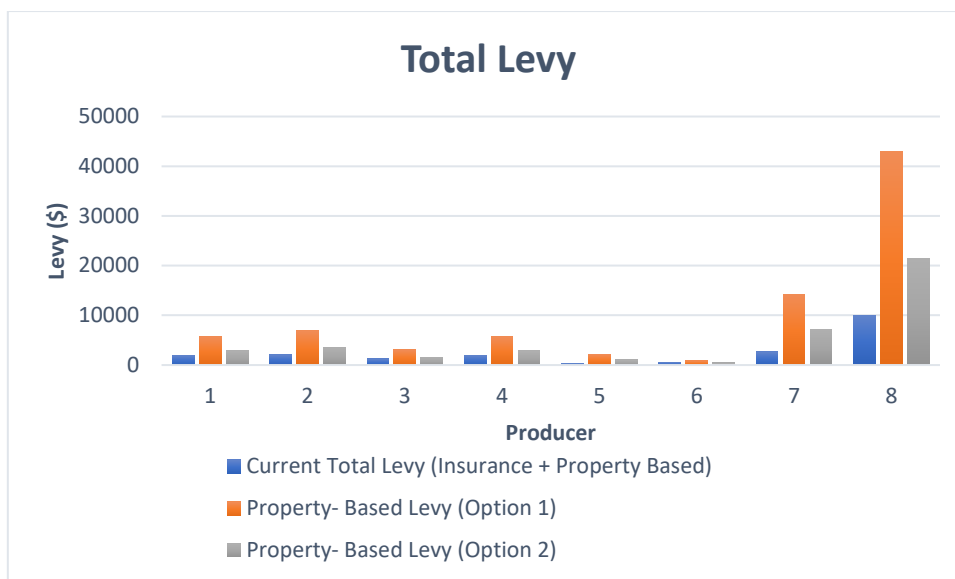


Figure 3. Total fire levy contribution compared to the potential property-based levies under the proposed funding model.

This table shows the increase between each producer’s current total fire levy (insurance and property-based levy) and the potential property-based levy under the proposed funding model. *Table 2.* Each producer’s current total fire levy and potential property-based levy under options 1 and 2 in the proposed funding model.

Producer	Current Property-Based Levy	Current Insurance Levy	Current Total Fire Levy (Insurance + Property-Based)	Property-Based Levy Option 1	Property-Based Levy Option 2	Increase (Option 1)	Increase (Option 2)
1	\$666	\$1328	\$1995	\$5712	\$2856	\$3717 (186%)	\$861 (43%)
2	\$806	\$1301	\$2107	\$6905	\$3453	\$4798 (227%)	\$1346 (63%)
3	\$362	\$938	\$1300	\$3100	\$1550	\$1800 (138%)	\$250 (19%)
4	\$660	\$1325	\$1985	\$5700	\$2856	\$3715 (187%)	\$871 (43%)
5	\$286	\$113	\$399	\$2208	\$1104	\$1809 (453%)	\$705 (176%)
6	\$101	\$487	\$588	\$936	\$468	\$348 (59%)	\$120 (20%)
7	\$1666	\$993	\$2659	\$14280	\$7140	\$11621 (437%)	\$4481 (168%)
8	\$5014	\$5010	\$10024	\$42984	\$21492	\$32960 (328%)	\$11468 (114%)



Conclusion

TFGA understands that a sufficiently funded emergency service will underpin great prosperity for our state. However, we believe primary producers are being unfairly targeted with increasing levies that are more reflective of a tax as they are inequitable and have been devised with negligible consultation.

We believe first and foremost that rural landholders should not be subject to any increases in their fire service levy.

We welcome further consultation. Please contact TFGA if you require more information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A. Cameron', is positioned below the text 'Yours sincerely,'.

Alastair Cameron
Interim Chief Executive Officer