



25 October 2023

Felix Ellis MP
Minister for Police, Fire and Emergency Management
Tasmanian Government
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Dear Minister Ellis

DRAFT TASMANIA FIRE AND EMERGENCY SERVICES BILL

Devonport City Council (DCC) provides this submission (as endorsed at October 2023 Council Meeting) in response to consultation on the Draft Tasmania Fire and Emergency Services Bill.

It is understood the Bill will establish the Tasmanian Fire and Emergency Service (TFES) through combining the Tasmanian Fire Service and the State Emergency Service into the one entity.

Whilst Council is not in a position to make specific comments in relation to the merits or otherwise of the new structure, there are a number of changes which impact on local government and relevant feedback is provided below.

Funding Model

DCC has been a strong advocate over many years for the need to reform the existing Fire Levy funding model. Council made a submission to the Blake Report in 2020 as it considers the existing structure totally inequitable, unfairly burdening urban property owners.

Given the levy is applied as a component of Council rates, local government wears the brunt of this inequity.

The current system, based on a percentage of a properties assessed annual value (AAV), has many different rates as highlighted in Table 1 below and is not an acceptable or fair model.

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Table 1 – Examples – Current Funding Model Inequities

Location	Classification Rate	Cost for an average AAV
Burnie	1.4%	\$268
Devonport	1.2%	\$219
Hobart	0.89%	\$160
West Launceston	1.1%	\$208
Glenorchy	1.1%	\$206
Ulverstone	0.35%	\$64
New Norfolk	0.31%	\$44
St Helens	0.37%	\$52

Most Tasmanians would expect, and rightly so, a broadly consistent level of service when it comes fire emergencies as they would with other community services such as policing or education. Given the geographical differences and our sparse population, services may vary depending on location and need, however resources are allocated to provide the best possible service within what is possible. At times, services are more efficiently delivered in urban areas than they are in rural or remote locations, and for other services it is vice versa. To attempt to apply a levy based on a perceived cost of service is a flawed approach, particular when no clear difference in service level exists.

In the context of the Fire Levy, the community recognises and expects fire emergencies are addressed in the most effective manner possible. For example, urban brigades are often best placed, and do respond the quickest to fires in rural or regional locations. Aircraft response to remote rural fires are often the most effective response in these situations. Local government localities have no impact on the level of response provided.

The current funding structure infers areas have a superior service and therefore should pay more. This is illogical, on any level and can only be fairly addressed with a single statewide rate as suggested under Option 1.

There appears to be no justification or basis to support the alternative option (Option 2) of maintaining different levy rates between urban and rural areas. The only rationale appears to be a desire to more closely align with the existing levy total and minimise increases. This concern would be more fairly addressed through adopting Option 1 and applying a phase in period to cap the quantum of any increases.

Given the Fire Levy is applied to council rate notices, any variation results in distorted and inaccurate comparisons being made between council rates (total rates bill) across local government areas. This leads to inaccurate community perception in relation to the level of rating by a council.

Regardless of the levy Option that is ultimately progressed, the State Government should instigate and maintain an education process to ensure ratepayers understand the levy is a State tax, funding emergency services and not a council charge.

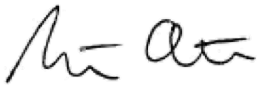
The administration fee payable to council for levy collection should not be reduced.

Other Matters

The new legislation should mandate that the State Fire and Emergency Service Committee (\$17) along with any other new Committees (\$18), include local government representation, given the sector's role in collecting the levy and in emergency management and social recovery more broadly.

In DCC's previous submission to the Blake Review, it was proposed that existing local government funding to the SES ceases with this being replaced through the new proposed Fire Levy. SES assets currently owned by local government should also be transferred to the new entity. Information released as part of the draft Bill does not appear to clarify these two points, both of which DCC maintains are still appropriate.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Matthew Atkins', written in a cursive style.

Matthew Atkins
GENERAL MANAGER