

27 January 2022

Andrew Lea
Director SES
State Emergency Service
Via email: ses@ses.tas.gov.au

Dear Andrew

State Emergency Service Structural Flood Mitigation Investment Policy

Thank you for the opportunity to provide a submission on the *Consultation Draft - State Emergency Service Structural Flood Mitigation Investment Policy*. This submission has been prepared by the Local Government Association of Tasmania (LGAT) and developed based on previous engagement with local government in relation to flood mitigation funding.

LGAT is incorporated under the *Local Government Act 1993* and is the representative body and advocate for local government in Tasmania. Where a council has made a direct submission to this process, any omission of specific comments made by that council in this submission should not be viewed as lack of support by LGAT for that specific issue.

LGAT welcomes the development of a state-wide policy by the State Government to guide flood investment across Tasmania. We have previously called on the State Government for increased investment in flood mitigation to protect vulnerable and at-risk communities. Tasmania needs to invest in mitigation now to avoid and reduce future risks to communities. Already natural disasters annually cost on average the Australian economy \$38 billion. This is projected to rise to \$73 billion per year by 2060¹, even under a low emissions scenario. For Tasmania, the average annual economic costs from natural disasters are estimated to increase to \$630 million by 2060.

State governments around the country are actively preparing for emergency situations and are working on risk mitigation following the outcomes of the *Royal Commission Report into National Natural Disaster Arrangements*. With the experience of the 2019-2020 bushfire season, the Report outlined the necessity of state governments to prepare

¹ Deloitte Access Economics (2021) *Special report: Update to the economic costs of natural disasters in Australia*, available at: <https://www2.deloitte.com/au/en/pages/economics/articles/building-australias-natural-disaster-resilience.html>

for emergency situations and mitigation through effective resource and responsibility sharing agreements.²

The release of the *Tasmanian Disaster Resilience Strategy 2020-2050* (TDRS) is a positive outcome to guide future resilience and mitigation efforts. The Strategy demonstrates that the State Government intends to take a lead in coordinating, funding, and building resilience to and preparing for emergency situations, including flooding. Action by the State Government is essential if at-risk communities are to be protected.

Flood mitigation investment is a critical concern for local governments who have participated in extensive mapping and mitigation investment in their municipalities. At a minimum, the draft Investment Policy needs to consider the following concerns:

- The draft Policy must be embedded with the principles of increased mitigation funding – 97 per cent of funding in emergency management is directed to recovery, while only three per cent is directed to mitigation.
- The State Government needs to take equal responsibility for funding by acting with Federal and local government on flood mitigation. Previously, the State Government provided equal funding arrangements for flood mitigation, but have now sidestepped from this responsibility.
- Investment must be linked to risk and vulnerability and not to a traditional grants process. This needs to be supported by detailed state-wide data.
- The current process places accessibility barriers to councils who are unable or reluctant to participate due to reasons such as a lack of resources within council to participate at that time, budgetary considerations for sponsoring the project, and the expectation that other councils will be prioritised. This is particularly true for small and rural councils that face significant risks but attract limited investment in mitigation.
- The investment process needs to shift to be more collaborative and provide the best reduction of risk for Tasmania. The State Government needs to work directly with LGAT, councils, and other stakeholders to better prioritise risk-mitigation. A collaborative model provides the opportunity for stakeholders to work together at a catchment scale, providing an efficient way to understand and manage risk.

The draft Policy is intended to be filtered through both mechanisms and policies (the TDRS and Disaster Resilience Outcomes). For this to be successful the State Government will need to ensure that broad risk assessments at a state-level are considered. A collective understanding of risk is important to inform the State Government on flood infrastructure mitigation investment and assessing grant applications. A good example of where this has already been accomplished is in fire mitigation. Fire Area Management

² *Royal Commission into National Natural Disaster Arrangements Report* (2020), available at: <https://naturaldisaster.royalcommission.gov.au/publications/royal-commission-national-natural-disaster-arrangements-report>

Committees provide comprehensive risk assessments that have led to mitigation work being prioritised according to a state-wide perspective analysis of risk. Developing a similar framework for floods is needed if it intends to provide guidance on infrastructure mitigation.

If you have any questions or would like further information, please contact Ben Morris at ben.morris@lgat.tas.gov.au or via phone on (03) 6146 3740.

Yours sincerely,



Dion Lester
CHIEF EXECUTIVE OFFICER