



**BUSHFIRE RECOVERY  
VICTORIA**

**Submission to the *2021 Regional  
Telecommunications Review***

Final Version

30 September 2021

## Purpose

Bushfire Recovery Victoria (BRV) strongly supports the review of telecommunications services in rural and regional communities. The intent of this paper is to provide concise, constructive, and usable information and insight to assist the Committee in its assessment.

The core purpose of this submission is to:

- Raise awareness of Bushfire Recovery Victoria's role, responsibilities and recovery priorities in telecommunication matters.
- Consolidate and convey key issues and risks experienced by disaster-impacted and disaster-prone communities in Victoria.
- Identify and articulate challenges and opportunities that may assist the Committee in its review findings and recommendations.

## Submission Overview

Over the last 18 months, Bushfire Recovery Victoria has been working closely with disaster-impacted communities so that they can lead their own recovery process. In this position we have listened and received many insights and experiences about the challenges and risks of living and/or working in rural and regional areas. Poor or sporadic mobile phone coverage, "blackspots" and lack of technological solutions is a consistent message raised either directly or indirectly through stakeholders to the agency. We will continue to ensure those communities are at the front and centre of our recovery efforts, coordinating across all our partners to ensure recovery services and support are integrated, seamless and easy to access.

Our submission provides a brief introduction to Bushfire Recovery Victoria, its role amongst state departments and agencies, key responsibilities and its commitments to communities responding to recent natural disaster events. It highlights the critical importance of telecommunications to communities that are isolated and at-risk to future natural events, and how past events have (again) exposed vulnerabilities and limitations with infrastructure and network coverage. The final section of this paper identifies short- to medium-term opportunities that will support and enable communities in developing resilience to future natural disaster events.

## 1. Bushfire Recovery Victoria

### 1.1 Role and Responsibilities

Bushfire Recovery Victoria is a dedicated and permanent agency that was established immediately after the 2019-20 Eastern Victorian fires. We work directly with disaster-impacted communities, state departments and agencies, and across all three tiers of government to provide effective and timely support in disaster recovery and resilience efforts.

The Victorian State Emergency Management Plan outlines the emergency management arrangements (from response to recovery) to inform all levels of planning – state, regional and municipal. The roles and responsibilities of all emergency management agencies are embedded in the SEMP and published on the Emergency Management Victoria website ([link](#) to BRV Role Statement).

Victoria has adopted a sectoral approach to improve critical infrastructure resilience. There are presently eight critical infrastructure sectors with corresponding lead portfolio departments. For the 'communications' sector, Department of Jobs, Precincts and Regions (formerly DEDJTR) is the responsible department. See Item 3.3 for additional information.

## 2. Issues and Risks for Fire-Impacted Communities

### 2.1 Disaster events exposing vulnerabilities

The 2009 'Black Saturday' bushfires and the Eastern Victorian Fires of 2019-20 exposed serious deficiencies in the telecommunications infrastructure/ communications network across Victoria. This impacted the core functions of emergency services and further exacerbated the risks faced by communities living and working in high-risk (disaster prone and isolated) environments.

The *2009 Victorian Bushfires Royal Commission Final Report* found that 'communications systems on 7 February were also hindered by poor coverage, lack of interoperability between emergency services agencies, and insufficient investment in new technologies... These problems were exacerbated when fire damaged or destroyed radio and telecommunications infrastructure'.

In April 2020, the Australian Communications and Media Authority reported that 324 facilities were impacted by the Eastern Victorian Fires. The *After the Flames – Community Reflections* report found that 'many communities lost telecommunications and power for protracted periods during and after the fires. Anecdotal evidence suggests some communities were ill-prepared for the isolation that cut-off essential supports and supplies during the emergency. For some, this increased their vulnerability during the bushfire event'.

Both the North East and East Gippsland regions have reported that a lack of sufficient telecommunications results in a risk to life and community wellbeing. The risk to economic recovery and development due to poor telecommunication access is inconsistent with a modern global environment reliant on information technology. Downtime from poor telecommunications has also resulted in significant financial impacts on local businesses.

The *Regional Telecommunications Review 2021 Issues Paper* highlights the importance that reliable telecommunications can play in informing and protecting our communities. There is little value in arguing something that is already acknowledged, however the paper covered off the issue so well that it is worth restating: 'natural disasters like bushfires and extreme weather events place pressure on telecommunications networks when they are most needed. Telecommunications outages caused by loss of mains power and damage to networks can affect local emergency coordination efforts and the operation of public warning systems, as well as disrupting supply chains and access to essential services in the aftermath of disaster events' (p.8).

### 2.2 Mobile black spots and poor network coverage

Previous consultation with key stakeholders and community members has seen the issue of mobile "black spots" and very poor network coverage ("grey spots") consistently raised as an issue and future concern. This was also heard loud and clear in recent discussions with Forest Fire Management, CFA and volunteer firefighters at the February 2021 East Gippsland and Towong Complex Site Taskforce sessions.

Both the *Ovens Murray Digital Plan* and the *Gippsland Digital Plan* have raised the issue of 'mobile blackspots' and greyspots as a priority issue in the region. The Ovens Murray has identified 294 blackspots across its regional footprint and Gippsland has recorded a staggering 496. More information on RDV's Digital Plans is in Item 3.4.

Community members are becoming increasingly frustrated and vocal at the slow progress and are demanding a faster resolution. Some State and Federal Members are addressing the problem and advocating for further investment and rollout to address the serious issue of black spots. Community members are requesting that funding is earmarked so that the resilience of bushfire telecommunications can happen sooner rather than later. Note, the following article is just one of several that have been published ([ABC article](#)).

Although there has been additional investment, the extent of the problem isn't well understood or mapped to reflect if the funding is adequate to resolve the higher-priority mobile black spots. Further

research is required to better understand the extent of the issue and continued cooperation between federal and state departments/ agencies is required to better prioritise funding allocations and resources.

## 3. Core Strategies and Plans

### 3.1 State Recovery Plan and Recovery Framework

The *Eastern Victorian Fires 2019-20 State Recovery Plan* (SRP) presents the Victorian Government's (and BRV's) priorities and actions for the next 12-18 months. A 'recovery priority' of the plan states that improving the coverage and resilience of Victoria's telecommunications network in bushfire and disaster-prone areas is supported. Actions required to achieve this generally include supporting the restoration and resilience of telecommunications and energy services. More specific recovery actions include:

- Assisting NBN Co with restoration of NBN cable to Mallacoota
- **Providing a conduit/ escalation role for local government, residents and providers**
- Engaging with the Commonwealth Governments \$37.1 million telecommunications resilience package.

Supporting the improvement of network coverage and resilience is clearly articulated in the plan. In addition to this, BRV has a commitment to listen to local and regional community members and convey their concerns and issues to relevant levels of government. More information on BRV's specific Recovery Actions can be found in **Attachment A**.

Bushfire Recovery Victoria is also guided by a Recovery Framework that strives for a consistent and community-led approach to the planning and delivery of recovery activities. Community-led recovery is at the heart of BRV's approach. BRV works directly with individuals and communities to listen, help and deliver what they need through the long process of recovery, partnering with all levels of government, with businesses and not-for-profit organisations to coordinate and commission recovery efforts that are locally driven and locally delivered.

Aligns to Opportunity #1 (Community-led recovery)

### 3.1 Planning Policy Framework and Planning Schemes

Each Victorian municipality has a Planning Scheme which contains state and local planning policies, zones and overlays and other provisions that affect how land can be used and developed. It is a legal document that is prepared and approved under the *Planning and Environment Act 1987*.

In each of the planning schemes for East Gippsland, Towong and Alpine Shire Council there is a section of policy that addresses 'Telecommunications' (Clause 19.03). Its principal objective is to facilitate the orderly development, extension and maintenance of telecommunication infrastructure.

There are seven strategies listed to help realise this objective. Of particular note are the first two strategies that align closely with the priorities of the State Recovery Plan:

- Facilitate the upgrading and maintenance of telecommunications facilities; and,
- Ensure that modern telecommunications facilities are widely accessible to business, industry and the community.

Within the 'Particular Provisions' section of each planning scheme, there is Clause 52.19 Telecommunications Facility which sets out the following purpose:

- To ensure that telecommunications infrastructure and services are provided in an efficient and cost effective manner to meet community needs.
- To facilitate an effective statewide telecommunications network in a manner consistent with orderly and proper planning.
- To encourage the provision of telecommunications facilities with minimal impact on the amenity of the area.

This policy identifies what types of facilities require a planning permit and specifies certain exemptions from notice and review. For example, if the telecommunications facility is funded, or partly funded, by the Commonwealth through the Mobile Black Spot Program, or the State of Victoria.

### **3.2 Code of Practice for Telecommunications Facilities in Victoria 2004**

The *Code of Practice for Telecommunications Facilities in Victoria* is an incorporated document in all Victorian planning schemes. It is also a 'policy document' listed in Clause 19.03 Telecommunications.

The purpose of the code is to set out the circumstances and requirements under which land may be developed for a telecommunications facility without the need for a planning permit; and, to set out principles for the design, siting, construction and operation of a telecommunications facility which a responsible authority must consider when deciding on an application for a planning permit.

The current document is close to 17 years old and makes little to no mention of essential/ critical/ disaster recovery infrastructure. Working with the Department of Environment, Land, Water and Planning (DELWP) and DJPR to review and update this document may identify opportunities and efficiencies to improve the rollout of telecommunications in high-risk environments.

Aligns to Opportunity #2 (Integrated Systems & Whole-of-Government Coordination)

### **3.3 EMV's Critical Infrastructure Resilience Strategy**

The Critical Infrastructure Resilience Strategy sets out the vision, principles and strategic priorities for the future direction in building resilience of Victoria's critical infrastructure. Although it does not identify telecommunications as an Essential Service, it does recognise that 'information technologies and communications networks' is critical infrastructure. The following is an excerpt from the strategy which highlights the importance that telecommunications plays:

*Critical infrastructure includes those physical facilities, supply chains, systems, assets, information technologies and communication networks which, if destroyed, degraded or rendered unavailable for an extended period, would significantly impact on the social or economic wellbeing of the Victorian community.*

Victoria has adopted a sectoral approach to improve critical infrastructure resilience. There are presently eight critical infrastructure sectors with corresponding lead portfolio departments. For the 'communications' sector, DJPR (formerly DEDJTR) is the responsible department. BRV is currently working with DJPR to provide support where needed and has common objectives to improving telecommunications for impacted and vulnerable communities.

Aligns to Opportunity #2 (Integrated Systems & Whole-of-Government Coordination)

### **3.4 Regional Plans**

BRV refers to and relies on several key regional plans to inform discussion and assist with its decision making. For the sake of brevity, the following will only briefly discuss key regional plans and highlight content that is applicable to telecommunications matters discussed herein. DJPR's submission and the Digital Plans themselves go into more depth than is required for the purpose of this submission. However, links to webpages and documents are provided for easy reference and further information.

Regional Development Victoria commissioned each Regional Partnership to develop Digital Plans for their respective regions. Each plan aims to provide an evidence base that can be used to understand both existing and future digital requirements as well as a platform to advocate to industry and local, state and federal governments to improve their regions digital connectivity.

## Ovens Murray Digital Plan

A Priority Action of the plan is to provide mobile telephone coverage in priority blackspot areas and locations with poor/ unreliable coverage, with consideration to isolated communities, high risk bushfire areas and tourism locations (p.28). It also acknowledges that there is a very different 'lived experience' of regional people than what is marketed by providers or carriers, especially for remote and at-risk residents.

## Gippsland Digital Plan

This plan also identifies the 'prevalence of blackspots' as a key issue and priority for the region and recommends that the state should advocate for mobile roaming in remote locations. In addition to this, the plan makes a strong and clear recommendation that the state government should continue, review and extend its regional telecommunications advocacy, co-investment and pilot programs to address unmet needs and capitalise on opportunities... (p. 16).

## East Gippsland Recovery Plan 19-20

The *East Gippsland 2019-20 Bushfire Recovery Plan*, developed by the East Gippsland Recovery Committee, is an important document to help plan and manage the delivery of bushfire recovery services and support. Community-led recovery is central to its approach and the plan has been informed by issues and priorities raised by local communities and developed in parallel with the establishment of community recovery committees.

### Built Environment Recovery Priority Action:

**Improve the resilience of telecommunications, water, and electricity infrastructure to reduce the likelihood of failure, particularly for remote communities, during future events.**

- Telecommunications (landline and mobile) and electricity supplies were interrupted early in the event for some remote communities and took extended periods of time to restore. This impacted community's capacity to access information during the event and reduced capacity of agencies to deliver effective relief. There is a need to explore and implement options to improve resilience of systems including education about use of systems during events.

Aligns to Opportunity #3 (More support to regional and at-risk communities)

## **4. Opportunities to Build Resilience**

### **4.1 Opportunity #1 – Community-led Recovery**

State departments and agencies have a critical role in not only supporting, but also enabling and empowering local communities to better recognise, recover from and adapt (resilience) to natural disaster events. BRV believes in a community-led approach and is committed to the cause. For this to happen, funding and initiatives need to facilitate local stakeholders and community groups to develop solutions to local and regional problems, thus getting their interest and ownership in the process.

It is integral that state departments continue to listen and offer assistance where they can. However, the ultimate objective is to empower and support communities in their recovery and resilience journey. If we do this well, then bigger state, or even national issues such as telecommunications blackspots can be quickly captured and conveyed as part of our coordination and escalation role.

### **4.2 Opportunity #2 – Integrated Systems & Whole-of-Government Coordination**

A whole-of-government coordination approach is far from an original idea or modern suggestion. However, this point is more focused on the 'digital' integration (not just compatible) systems and tools that are required if the different departments and agencies are to work more efficiently and effectively.

We are moving faster into the digital age and there is a vast amount of information and data being collected by departments, agencies and service providers. Information sharing is getting better,

however a lot of information is still siloed, inaccessible or sharing of information is restricted for varied reasons, e.g. privacy concerns, internal approvals, and perceived risk. Data and spatial/ GIS systems that allow multi-agency access and utilisation will see a better understanding of the issues and needs of communities, and will lead to better evidence-based decision making and allocation of resources.

#### **4.3 Opportunity #3 – More support to regional and at-risk communities**

Rural and regional communities cannot compete with more densely populated areas and peri-urban centres. Prioritisation and allocation of available funding and resources needs to be fairly weighted so that vulnerable/ at-risk communities can receive essential support, despite not having the numbers to make a viable business case or investment return. There is better recognition of the compounding challenges and limitations that face rural and regional people, however, more needs to be done to balance out services and support.

A coordinated regional approach to identify and resolve telecommunication issues is required, including financial investment for spatial analysis and solutions development in the short and long term. Ultimately, a reliable, resilient and accessible telecommunication system is needed that provides emergency contact and business services commensurate to the metropolitan areas.

## **5. References and Links**

After the Flames – Community Reflections, Bushfire Recovery Victoria [link](#)

Eastern Victorian Fires 2019-20 State Recovery Plan [link](#)

East Gippsland Recovery Plan [link](#)

Recovery Framework, BRV [link](#)

Regional Digital Plans, Regional Development Victoria [link](#)

Regional Telecommunications Review 2021 Issues Paper [link](#)

Role Statements, Emergency Management Victoria, [link](#)

2009 Victorian Bushfires Royal Commission Final Report [link](#)

## Attachment A - Recovery Actions

### Support the restoration and resilience of telecommunications and energy services

Challenge	Recovery actions	Priorities	Timing	Action ID
<p><b>Telecommunication and NBN services were impacted or unavailable for some communities</b></p>	<p>Assist NBN Co with restoration of NBN cable to Mallacoota. (BAI11.1)</p> <p>Provide a conduit / escalation role for local government and residents of fire affected communities to escalate and resolve with utility providers any issues related to NBN services and telecommunications. (BAI11.2)</p>	<ul style="list-style-type: none"> <li>Restoration of energy and telecommunications services are supported.</li> <li>Landowners are assisted as required to resolve any connection issues with providers.</li> <li>NBN Co is supported to connect Mallacoota to the NBN.</li> </ul>	Medium term	BAI11
<p><b>Telecommunications network vulnerabilities were exposed</b></p>	<p>Engage with the Commonwealth Government's \$371 million telecommunications resilience package to target funding towards Victorian priorities and implement initiatives that will increase communications resiliency in future emergencies. This will include:</p> <ul style="list-style-type: none"> <li>Upgrade alternative power sources for mobile base stations (limited to Commonwealth MBSP funded base stations). (BAI12.1)</li> <li>Purchase portable communications facilities such as cells on wheels (COWs), mobile exchanges on wheels (MEOWs) and NBN Road Muster trucks. (BAI12.2)</li> <li>Deploy approximately 2,000 NBN Co satellite services to rural and country fire services and designated evacuation centres. (BAI12.3)</li> <li>Deliver improved community awareness programs. (BAI12.4)</li> <li>Commonwealth also has additional funding committed for further blackspots rounds and its Regional Connectivity Program relevant to telecommunications resiliency. (BAI12.5)</li> </ul>	<ul style="list-style-type: none"> <li>Restoration of telecommunications services are supported</li> <li>Coverage and resilience of Victoria's telecommunications network in bushfire and disaster-prone areas is supported.</li> </ul>	Medium term	BAI12
<p><b>Residents have not been able to repair damages to energy lines, or have lines that represent fire hazards</b></p>	<p>Reduce fire hazards and support restoration and resilience efforts for residents in high bushfire risk areas through a Private Overhead Electric Lines grants program to underground them in affected areas. This will underground up to 50km of dangerous overhead electricity lines. (BAI13.1)</p>	<ul style="list-style-type: none"> <li>Restoration and improvement of damaged and dangerous overground electricity lines is supported.</li> </ul>	Medium term	BAI13