



January 16, 2026

Department of Fire and Emergency Services (DFES)
Bushfire Technical Services

Via email: AFDRS@dfes.wa.gov.au

**Subject: Submission on the Australian Fire Danger Rating System (AFDRS)
Fire Weather District Review**

Thank you for the opportunity to provide feedback on the review of Fire Weather Districts (FWDs) under the Australian Fire Danger Rating System (AFDRS). The Pastoralists and Graziers Association of Western Australia (PGA of WA) represents pastoralists, graziers, and agricultural producers across the state, many of whom operate in rural, regional and remote areas with significant bushfire risk.

We acknowledge the critical importance of accurate and practical fire danger information for the protection of life, livestock, property, and agricultural assets. We understand this review is intended to address anomalies in FWD boundaries that have emerged since the implementation of the national AFDRS, and we offer the following comments informed by our members' operational needs and experience on the land:

Support for Practical Boundary Adjustments

We support the principle that FWDs should align with Local Government Area (LGA) boundaries wherever possible to ensure clarity and facilitate clear communication and coordination between land managers, local volunteer bushfire brigades—who are most often the primary responders in rural areas—and shire authorities. Where LGAs must be divided, boundaries must follow unmistakable, permanent features such as major roads, rivers, or other obvious geographic lines. This ensures landowners can instantly understand which district they are in and what warnings apply.

We specifically endorse the review's capacity to allow LGAs to realign within broader FWDs to better reflect local conditions and communities of interest. An example is the current situation in one Shire, which, due to being grouped within the same FWD as another Shire some 70 kilometres south and in a geographically very different situation, experiences significantly different fire behaviour, fuel types, and land use. This misalignment has led to impractical outcomes, particularly during the Restricted Burning Period, where the uniform application of Fire Danger Ratings (FDRs) and associated Total Fire Bans disproportionately restricts necessary agricultural and fuel management activities in one area versus another.

Accuracy, Trust, and Operational Realities

The PGA emphasises that for the AFDRS to maintain credibility and utility, FWDs must group areas with truly similar vegetation, climate, and land-use characteristics. Inaccurate ratings that do not reflect on-ground conditions risk fostering scepticism and complacency among landholders,

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undermining the system's effectiveness. This review is an important opportunity to restore trust by ensuring ratings are locally relevant and actionable.

We note that the implementation of the AFDRS has introduced significant operational challenges, particularly during shoulder seasons. The new rating matrix triggers Total Fire Bans and cancels burning permits at lower numerical thresholds than the previous system, severely limiting the windows available for essential hazard reduction burns, stubble burning, and other farm management practices. While adjusting FWD boundaries may alleviate this issue in some misaligned shires, we urge DFES and the Bureau of Meteorology to acknowledge this broader systemic concern, which continues to impact agricultural risk management across the state.

The Critical Role of Local Knowledge

Any boundary changes must be informed by deep local knowledge held by landholders, local governments, and bushfire brigades. The PGA strongly supports empowering Chief Bushfire Control Officers and Bushfire Advisory Committees to utilise available mechanisms within the AFDRS framework—such as adjusting local fuel load variables—to ensure the system responsively reflects true local risk, especially for specific agricultural fuel types like cereal stubble.

We appreciate the compressed timeframe for this review and urge a streamlined process that genuinely incorporates practical stakeholder feedback. The PGA of WA is keen to provide further local insights and support efforts to create a fire danger rating system that is both scientifically robust and practically workable for those on the land.

Yours sincerely,



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