Cairns Regional Council

Submission to the National Emergency Management Agency

Disaster Management Reform Discussion Paper (6 July 2026)

Submitted in response to the consultation period closing 19 August 2026

Executive Summary

Cairns Regional Council (Council) welcomes the opportunity to provide this submission in response to the Australian Government's Disaster Management Reform Discussion Paper (6 July 2026).

Council's key priorities

Council's submission raises a wide range of matters against the Discussion Paper's 14 sections. However, two matters are of such significance to Council, its communities and its ratepayers and residents that Council wishes to bring them forward as the highest-priority issues in this submission, ahead of all other matters raised.

1. Opposition to reduced Australian Government cost-sharing and abolishment of efficiencies

Council opposes the proposed reduction in the Australian Government's contribution under the Disaster Recovery Funding Arrangements (DRFA), including the proposed move to a standard 50:50 cost-sharing model, and opposes the abolishment of the efficiencies funding arrangements. Any reduction in the Federal contribution would increase Queensland's share of disaster recovery costs and, if not offset by other funding, risk placing additional financial pressure on local governments, residents and ratepayers.

Queensland Reconstruction Authority (QRA) modelling indicates this shift would have reduced Commonwealth funding towards Council's disaster recovery program by approximately $15.8 million (22 per cent) had it applied since 2018 [1], and would remove the mechanism through which Queensland has directed more than $700 million in DRFA savings into statewide disaster mitigation and risk reduction, including the $450 million Queensland Resilience and Risk Reduction Program [2] helping target investment towards jurisdictions facing the highest disaster burden and risk exposure.

2. No worse-off outcome for Queensland councils and communities

Council seeks a clear commitment that Queensland councils, communities, residents and ratepayers will not be financially worse off under any revised disaster recovery funding framework. Queensland's exposure to natural disasters is significant, and local governments have limited financial capacity to absorb additional recovery costs. Council considers a no-worse-off guarantee to be a threshold requirement for any reform to proceed, and recommends it be incorporated as an explicit design principle of the Disaster Recovery Funding Framework (DRFF) rather than left to be tested only after the framework takes effect.

Council supports the Australian Government's commitment to modernising Australia's disaster management arrangements and recognises the need for a framework that is simpler, more transparent, financially sustainable and capable of responding to increasingly frequent and complex natural disasters.

Council supports reforms that reduce administrative burden, improve funding certainty, streamline approval processes and strengthen investment in disaster resilience. These objectives align with Council's experience that recovery arrangements should enable communities to move quickly from response to recovery while ensuring public investment delivers long-term resilience outcomes.

However, the practical reality is that should the overall pool of disaster recovery funding be reduced (which would be the case where Federal funding is reduced and not replaced by funding from other sources), there would be significant challenges prioritising and allocating this reduced funding pool across competing recovery projects and priorities. In our view, this challenge is likely to slow down the allocation of funding and increase administration as the relative merits of competing projects are assessed in more detail given funding constraints.

As one of Australia's most disaster-exposed local government areas, Council has extensive practical experience in disaster preparedness, response, recovery and reconstruction. Tropical Cyclone Jasper demonstrated the critical importance of a disaster funding framework that is responsive, flexible and supported by genuine collaboration between all levels of government. Since 2018, Council has managed more than $112 million through the Disaster Recovery Funding Arrangements (DRFA) [1], including approximately $81 million following Tropical Cyclone Jasper [1], enabling the restoration of essential public infrastructure and supporting community recovery.

While Council supports the elements of the proposed reforms aimed at reducing administration and improving program efficiency, it strongly opposes the proposed shift to a flat 50:50 Commonwealth cost-sharing model and the abolishment of efficiencies funding, and has significant further concerns regarding other aspects of the proposed DRFF. As stated earlier, QRA's financial analysis indicates that, had the proposed 50:50 arrangements applied since 2018, Commonwealth disaster recovery funding received by Council would have reduced by approximately $15.8 million, representing a reduction of around 22 per cent [1]. QRA's analysis also indicates that none of Council's five completed Betterment projects would have been eligible for equivalent funding under the proposed Resilient Infrastructure Scheme (RIS), resulting in a shortfall of approximately $2.8 million in resilience investment [1].

Council's concerns relate primarily to the proposed funding model rather than the broader reform agenda. In summary, Council considers that:

- the proposed flat 50:50 funding model must not be adopted in its current form, as it disadvantages jurisdictions with significantly higher disaster exposure;
- the abolishment of the DRFA efficiencies framework should not proceed without an equivalent replacement mechanism for statewide disaster mitigation and risk reduction investment;
- Queensland councils, communities, residents and ratepayers must not be left financially worse off under any revised framework, and a no-worse-off guarantee should be an explicit design principle of the DRFF;

- the principles underpinning the Betterment program should be retained within the proposed Resilient Infrastructure Scheme;
- mechanisms that reward efficient reconstruction should continue;
- greater clarity is required regarding Counter Disaster Operations and Exceptional Circumstances arrangements; and
- the recovery needs of First Nations communities and the future of risk reduction investment beyond the Disaster Ready Fund require dedicated attention.

This submission follows the structure of the Discussion Paper and responds directly to the consultation questions raised in each of its 14 sections, providing recommendations informed by Council's operational experience, financial analysis and lessons learned from recent disaster events.

1. Purpose

Council position

Council welcomes the opportunity to provide feedback on the Australian Government's proposed reforms to Australia's disaster management and disaster recovery funding arrangements, and on the Independent Review of Commonwealth Disaster Funding led by Mr Andrew Colvin AO APM which informs them.

Cairns is one of Australia's most disaster-prone local government areas. The region is regularly affected by tropical cyclones, severe flooding, storm tide, landslides and other natural hazards that place significant pressure on public infrastructure, essential services and community resilience. As the regional centre for Far North Queensland, Cairns also provides critical health, transport, emergency management and community services that support surrounding local government areas and remote communities during disaster events.

The experience of Tropical Cyclone Jasper reinforced the importance of a disaster funding framework that is timely, flexible and capable of responding to complex and prolonged disaster events. Recovery extended well beyond the emergency response phase and required close collaboration between the Australian Government, the Queensland Government and local government to restore essential infrastructure and support affected communities. The DRFA played a critical role in enabling that recovery and demonstrated the value of a nationally coordinated approach to disaster funding.

Council's submission is informed by its operational experience, financial modelling of the proposed reforms and the practical lessons learned through the planning, delivery and acquittal of disaster recovery and resilience projects. The following sections respond directly to each section and consultation question contained within the Discussion Paper, in the order in which they appear.

2. Australian Government role and priorities for disaster recovery funding

Council position

Council does not support the Australian Government's proposal to move to a flat 50:50 cost-shared partnership model with states and territories. While Council agrees that clearer governance arrangements can improve accountability, strengthen decision-making and support more effective collaboration during recovery, the proposed funding split itself would materially disadvantage Queensland, and the Cairns region in particular, as demonstrated by QRA's modelling outlined later in this section and at Attachment A. Council's opposition to the proposed 50:50 model is a central theme of this submission.

Council also supports the four stated Commonwealth priorities for recovery funding — support for individuals and families, support for households and communities, support for industry and not-for-profit organisations, and support for the reconstruction of essential public assets. However, Council considers that the practical, on-the-ground role of local government in delivering against each of these priorities is understated in the Discussion Paper.

Local government is not only responsible for restoring community infrastructure but also plays a central role in coordinating local recovery, supporting communities and facilitating the return of essential services following disaster events. In practice, local governments are often the first point of contact for affected communities once the immediate emergency response has concluded. Councils assess infrastructure damage, restore transport networks and public facilities, coordinate reconstruction programs, communicate with residents, support local businesses and work alongside state agencies to facilitate community recovery. In many regional communities, these activities continue for several years following a major disaster.

The experience of Tropical Cyclone Jasper demonstrated that effective recovery relies upon genuine collaboration between governments, with local government playing a central delivery role. This operational experience should be more explicitly reflected within the proposed framework, including recognising local government as a key delivery partner rather than simply an infrastructure owner or funding recipient.

Funding certainty for high-exposure jurisdictions

Council strongly opposes the shift to a flat 50:50 cost-sharing partnership on the terms currently proposed, given its practical effect on jurisdictions, like Queensland, that experience a disproportionately high frequency and cost of disasters.

Queensland experiences a significantly higher frequency of tropical cyclones, severe flooding and associated natural hazards than many other parts of Australia. Communities across Far North Queensland face repeated disaster impacts that place sustained pressure on public infrastructure and local government finances. A nationally consistent funding formula should recognise these differences in disaster exposure. Applying a uniform funding model across jurisdictions with markedly different risk profiles may produce inequitable outcomes and reduce the capacity of disaster-prone regions to recover in a resilient manner. Given the climate forecast, as mentioned in the discussion paper, of increased compounding, cascading and complex disasters, in a region susceptible to disasters, reduces the capacity to recover resiliently and further exposes the region's vulnerabilities and increases residual risk significantly. Appropriate funding models need to be developed to better support resilience building through recovery for these areas, as a matter of disaster equity, nationally and state wide.

QRA's financial modelling demonstrates the practical implications of the proposed reforms. Had the proposed funding model applied to disaster events since 2018, Commonwealth funding received by Council would have reduced by approximately $15.8 million, a reduction of around 22 per cent, across the five DRFA-eligible events Council has managed since the program's introduction. While this modelling is indicative pending release of full DRFF program guidelines, it highlights the potential scale of impact on councils with frequent disaster events. QRA's event-by-event modelling and methodology are provided at Attachment A to this submission.

However, if the overall pool of disaster recovery funding is reduced—as would occur if a reduction in Commonwealth funding is not offset by other sources—governments would face greater challenges in prioritising limited funding across competing recovery needs. This is likely to slow funding decisions and increase administrative burden as projects are subject to greater scrutiny and prioritisation within a more constrained funding environment.

Council also opposes the proposed abolishment of the DRFA efficiencies framework in its own right, separate from its overspend implications discussed above. Efficiencies are a key feature of the DRFA, incentivising the efficient delivery of reconstruction programs while directing the benefits of those efficiencies into disaster risk reduction. In Queensland, more than $700 million in DRFA savings have been allocated into statewide mitigation and resilience initiatives, including the $450 million Queensland Resilience and Risk Reduction Program [2], helping target investment towards jurisdictions facing the highest disaster burden and risk exposure.

Removing this mechanism without a genuinely equivalent replacement would represent a substantial, currently unquantified reduction in Queensland's capacity to invest in disaster resilience beyond individual project betterment.

Council also notes that, under DRFF, any legitimate cost overrun on a project relative to its estimated reconstruction cost (ERC) may no longer be reimbursable. Under the current DRFA, the State is able to fund actual eligible costs in full — even where they exceed a project's Recommended Value/ERC — by drawing on efficiencies realised elsewhere across the state's reconstruction program for that event year. The removal of the Efficiencies Framework under DRFF would remove this safety net, meaning legitimate overspends could fall entirely to the State and/or Council.

Council notes that the Australian Government Actuary's own projection of combined disaster recovery costs — approximately $70 billion nationally between 1 July 2028 and 30 June 2038 — underscores that this is a shared and growing fiscal challenge for all levels of government, not one that should be resolved by reducing the Commonwealth's proportionate contribution to the most disaster-exposed states.

For these reasons, Council seeks a clear and explicit commitment from the Australian Government that Queensland councils, communities, residents and ratepayers will not be financially worse off under any revised disaster recovery funding framework. Given Queensland's disproportionate disaster exposure and the limited financial capacity of local governments to absorb additional recovery costs, Council considers a no-worse-off guarantee to be a threshold requirement for the DRFF to proceed, and recommends it be adopted as an explicit design principle rather than assessed only after the framework takes effect.

Council recommendations

Council recommends that the Australian Government:

- explicitly recognise local government as a key delivery partner throughout disaster recovery, acknowledging its central role in restoring infrastructure, coordinating local recovery and supporting affected communities;
- adopt an explicit no-worse-off guarantee for Queensland councils, communities and ratepayers as a design principle of the DRFF, not merely an aspiration to be tested after implementation;
- retain the DRFA efficiencies framework, or replace it with a genuinely equivalent mechanism, to preserve Queensland's demonstrated capacity to direct savings into statewide disaster mitigation and risk reduction;
- reject the proposed flat 50:50 funding model in its current form, and maintain a higher, disaster-frequency-weighted Commonwealth contribution for jurisdictions with high and repeated disaster exposure, drawing on the AGA's own national cost projections; and
- engage local government earlier in the design and implementation of recovery programs.

3. New event-based activation trigger points

Council position

Council supports the Australian Government's objective of establishing a more streamlined, nationally consistent approach to disaster event activation, and understands the policy rationale for replacing the outdated $240,000 small disaster criterion.

However, Council has significant concerns regarding the practical effect of the proposed $2.70 million event-based activation trigger point for Queensland, when considered alongside the removal of the current financial year threshold model. Under the 2026-27 DRFA arrangements, Queensland's first and second state expenditure thresholds are set at $193,974,750 and $339,455,813 respectively — a structure that reflects the scale of the state's disaster exposure and provides for 75 per cent Commonwealth reimbursement above the second threshold. The proposed reforms would replace this with a flat 50 per cent Commonwealth contribution above a $2.70 million per-event trigger. While the new model may benefit smaller, less disaster-prone jurisdictions, QRA's modelling indicates it represents a materially less generous arrangement for a jurisdiction with Queensland's disaster frequency and severity. A formula related to disaster risk inclusive of consequence assessments should be considered and applied to ensure Council’s who need support are not disregarded, solely due to this new threshold. This will also recognise the geographic diversity and complexity within local government areas.

Consultation question 1

How would the new event-based activation trigger points work with relevant state/territory legislation and/or requirements for declaring disaster events in your jurisdiction?

Council response

Council recommends the Australian Government work directly with the Queensland Reconstruction Authority to confirm how the proposed event-based trigger points would interact with Queensland's existing disaster declaration processes under the Disaster Management Act 2003 (Qld), to avoid creating parallel or inconsistent eligibility tests for the same event.

Consultation question 2

How could disaster recovery costs transition from state/territory-only recovery funding arrangements to the DRFF once the new event-based financial trigger points are exceeded?

Council response

Council recommends a clear, published notification and cost-tracking protocol so that councils know, in real time during an active event, whether costs incurred are likely to be cost-shared. Uncertainty at the point of expenditure — rather than after the fact — is a key practical difficulty local government currently experiences.

Consultation question 3

What are the advantages and/or limitations of the proposed DRFF event-based activation trigger points model?

Council response

Council acknowledges the advantage of earlier access to Commonwealth support for smaller, more frequent events, particularly for smaller jurisdictions. However, the limitation for Queensland is significant: QRA's modelling indicates that, had the proposed 50:50 event-based model applied to disaster events affecting the Cairns region since 2018, Commonwealth funding towards Council's program would have been approximately $15.8 million lower — a reduction of around 22 per cent — compared to outcomes under the current financial year threshold model.

This outcome would have materially affected Council's capacity to restore infrastructure following major disaster events while placing increased financial pressure on state and local government. Council does not consider this consistent with the reform's stated objective of fairer, more equitable support for disaster-affected communities. A further limitation is the potential impact of a reduced overall disaster recovery funding pool. If a reduction in Commonwealth funding is not offset by other sources, governments would face greater challenges in prioritising limited funding across competing recovery needs. This could slow funding decisions and increase administrative burden as projects are subject to greater scrutiny and prioritisation within a more constrained funding environment.

Council also notes a further limitation specific to the proposed increase in the small disaster criterion, from $240,000 to $2.70 million. Although expressed as a statewide threshold, should Council be affected by a disaster with geographically isolated impacts — a common occurrence given the dispersed nature of Far North Queensland's road and community network — the increased threshold may restrict activation of DRFF funding support altogether for that event, even where the isolated impacts are locally significant.

Consultation question 4

How could this model work alongside audit and assurance requirements to streamline claiming while still providing appropriate accountability for use of significant public resources?

Council response

Council supports a proportionate, risk-based approach to audit and assurance under the new model, addressed further under Section 12 of this submission (Streamlining data and reporting).

Consultation question 5

What alternative models, such as a per capita model for event-based activation trigger points, could be explored and what is the underpinning policy logic or rationale of these alternatives?

Council response

Council recommends the Australian Government explore an alternative model that retains the proposed event-based trigger while providing a higher Commonwealth contribution for high-exposure jurisdictions through a transparent loading that reflects historical disaster frequency, cumulative exposure and consequence, rather than a flat national or per-capita figure. A per-capita-only model would risk under-recognising the exposure of regional and remote communities, which typically have smaller populations relative to the scale of infrastructure and disaster risk they carry as well as the impact on reliable supply chains that are often disrupted.

Council also recommends the Government publish detailed grandfathering arrangements as a priority, given the Discussion Paper confirms the current DRFA will continue to apply to disasters occurring before the DRFF commences. Councils currently managing multi-year reconstruction programs need early certainty about which funding rules will apply to events that straddle the transition.

Council recommendations

Council recommends that the Australian Government:

- work with the Queensland Reconstruction Authority to align event-based trigger point processes with existing state disaster declaration arrangements;
- publish a clear, real-time cost-tracking and notification protocol so councils know when trigger points have been exceeded during an active event;
- reject the proposed $2.70 million Queensland trigger point and flat 50:50 model in light of Council's modelled $15.8 million (22 per cent) funding reduction, and consider an alternative model that provides a higher Commonwealth contribution for high-exposure jurisdictions, reflecting disaster frequency, cumulative exposure and consequence rather than a uniform national figure;
- publish detailed grandfathering arrangements as a priority, to provide certainty for councils currently managing multi-year DRFA-funded reconstruction programs; and

- confirm whether in-kind (non-monetary) recovery assistance will remain an eligible cost under the DRFF, consistent with current DRFA practice.

4. Standardised packages: Introduction

Council position

Council supports the Australian Government's objective of simplifying disaster recovery assistance through nationally consistent, functionally described recovery packages. A common national framework has the potential to improve transparency, increase certainty for disaster-affected communities and reduce administrative complexity.

However, national consistency should not result in a uniform, one-size-fits-all approach. Recovery packages must retain sufficient flexibility to respond to differences in disaster risk, geography, infrastructure, cost, community need and recovery conditions, allowing assistance to be adapted to the circumstances of each event and affected community.

Consultation question 1

How does your jurisdiction define your core recovery functions?

Council response

Council's core recovery functions align broadly with the five proposed categories — individual and family hardship support, resilient infrastructure, community recovery, local economic support and environmental recovery — but are delivered locally through Council's Local Disaster Recovery Committee across four pillars: Human and Social, Infrastructure, Environment and Economic, with a primary role to deliver asset restoration programs and community recovery coordination functions.

Consultation question 2

Do you think packages based on functional descriptions will assist with the administration and communication of recovery packages?

Council response

Yes. Council supports the shift away from the current Category A–D structure, which groups assistance by reimbursement rate rather than recovery function, and finds it difficult to communicate to affected residents and businesses what support is actually available.

Consultation question 3

What support do states and territories, and local government provide that is currently funded by the DRFA and not addressed by these functional categories? How are these issues currently managed within the jurisdiction, and what are the implications if further funding is not provided in future recovery arrangements?

Council response

Council notes that Counter Disaster Operations — emergency protective works, traffic management and debris clearance undertaken during and immediately after an event — sit awkwardly within the proposed functional categories, which are oriented toward recovery rather than response. Council addresses this in detail under Section 6 of this submission. If CDO funding support is not clearly retained, councils would need to absorb these frontline costs from general revenue, which is not sustainable for a council managing recurrent, large-scale events.

Consultation question 4

What implementation/stakeholder issues does the proposed approach create?

Council response

Council's principal implementation concern is sequencing: councils will need clear guidance material and updated internal financial systems before the new categories take effect, to avoid a period where officers are uncertain which of the old or new categories apply to in-progress claims.

Council recommendations

Council recommends that the Australian Government:

- adopt functionally described recovery categories in place of the current Category A–D structure;
- ensure Counter Disaster Operations funding is clearly and explicitly retained within (or alongside) the new functional categories, not left ambiguous; and
- provide updated guidance material and transition lead time before the new categories take effect operationally;
- release the recommended Outcomes policy, as recommended in the Colvin Review, or consult with local government on its development, given the focus of this policy, is to ensure disaster related investment is scalable, sustainable, effective, equitable, transparent and accessible – all aspirational objectives that will need local government as a key disaster management stakeholder.

5. Standardised packages: Individuals and families

Council position

Council supports the introduction of a nationally consistent personal hardship payment scheme. The current jurisdiction-by-jurisdiction variation in payment types and amounts, ranging from $900 to $2,380 per family for personal hardship and distress payments, creates the potential for perceived inequity between communities affected by the same type of disaster event, and Council considers this undermines confidence in the fairness of the system more broadly.

Council also considers that the speed with which assistance becomes available is likely to have a significant influence on recovery outcomes. Delays in accessing financial assistance risk prolonging hardship, delaying the return of displaced residents and slowing broader community recovery.

Consultation question 1

What types/forms and levels of personal hardship assistance does your jurisdiction currently offer under the DRFA?

Council response

Queensland currently delivers Category A personal hardship and distress payments, emergency accommodation assistance, essential services reconnection and essential household contents grants through the Queensland Government, with Council supporting delivery through local information points and community recovery hubs.

Consultation question 2

How is DRFA personal hardship assistance activated and delivered in your jurisdiction?

Council response

Assistance is activated following a disaster declaration, with current process requiring the approval of Council's Chief Executive Officer, and delivered primarily through Queensland Government service centres, online channels and immediately after, recovery hubs, with Council providing local coordination, communication and referral support, as required.

Consultation question 3

How should the appropriate level (amount) of financial assistance for each form of payment be determined? Should some form of loading reflecting remoteness apply, and if so, at what level?

Council response

Council strongly supports a remote area loading. Far North Queensland includes remote and very remote communities where the cost of replacing essential household items, securing temporary accommodation and reconnecting services is materially higher than in metropolitan areas, consistent with the rationale for Services Australia's existing Remote Area Allowance. Council recommends the loading be benchmarked against actual regional cost-of-living data rather than a flat percentage.

Council supports nationally consistent baseline eligibility criteria and payment principles, while allowing transparent, evidence-based loadings for remote, very remote or high-cost regions where the cost of recovery is materially higher.

Consultation question 4

How should the eligibility criteria for each form of payment be determined? What could a proposed nationally consistent means test look like?

Council response

Council supports targeted, needs-based assistance but cautions that an overly complex means test will slow access to emergency payments precisely when speed matters most. Council recommends a simplified, self-assessed test for the initial emergency hardship and accommodation payments, with more detailed means testing reserved for the higher-value structural household assistance payment.

Consultation question 5

How can application and assessment processes ensure assistance can be accessed with minimal burden on disaster-affected individuals and families, and in a timely manner?

Council response

Council recommends a single national intake point, one stop shop, with pre-agreed data-sharing arrangements between Commonwealth and state systems, so that affected residents are not required to provide the same evidence multiple times across different payment types.

Consultation question 6

What would be required to ensure that existing state/territory systems are capable of supporting standardised payments?

Council response

Council understands this is principally a matter for the Queensland Government's systems, but notes that any transition should be tested well ahead of the traditional North Queensland cyclone season to avoid system readiness issues during an active event.

Consultation question 7

What would the impacts, risks, costs and benefits be for your jurisdiction by introducing standardised personal hardship payments?

Council response

Council considers the primary benefit would be improved community confidence and equity for cross-border and neighbouring communities. The principal risk is a levelling down rather than levelling up of payment amounts; Council recommends new national payment levels be set with reference to the higher end of current jurisdictional practice, not the lower end.

Council recommendations

Council recommends that the Australian Government:

- introduce a nationally consistent hardship payment scheme benchmarked against the higher end of current jurisdictional practice, not the lower end;
- apply a remote area loading benchmarked against actual regional cost-of-living data for remote and very remote Far North Queensland communities;
- adopt simplified, self-assessed eligibility for emergency-stage payments, reserving detailed means testing for higher-value structural assistance; and
- establish a single national intake point with Commonwealth–state data sharing to reduce duplicate evidence requirements for applicants.

6. Standardised packages: Community recovery

Council position

Cairns Regional Council supports the introduction of a consolidated community recovery category covering short-term clean-up, mental health and wellbeing services, disability services, the employment of a community recovery officer by impacted local governments, and support for not-for-profit organisations.

Community recovery is most effective when it is locally led and supported through genuine collaboration between all levels of government. Local governments possess detailed knowledge of community infrastructure, local service providers, community organisations and vulnerable populations, and should continue to be recognised as key leaders in planning and coordinating recovery activities.

Consultation question 1

Do the proposed packages appropriately cover the core community recovery functions currently provided by your jurisdiction following disasters? If not, what other forms of community recovery assistance would you like to see covered under the DRFF?

Council response

The proposed packages broadly cover Council's current community recovery functions. Council recommends the package explicitly include funding for community recovery hubs and drop-in centres, which have proven critical following Tropical Cyclone Jasper as a central place of contact for affected residents in or close to their neighbourhood.

Consultation question 2

What disaster-related recovery supports do people with disability need that are not currently provided through existing arrangements (including the DRFA)?

Council response

Council recommends further work to clarify the interaction between this package and the National Disability Insurance Scheme, particularly around temporary loss of home modifications, assistive technology and support worker access during displacement — an area where Council has observed gaps in current arrangements.

Council recommends further work across Government to enable resilience planning for NDIS recipients (and other at-risk communities) to access disaster related funding and support to build resilience. For example, through mandatory requirements for NDIS services providers to provide person centred emergency planning services to their participants. This is not, currently, a mandatory requirement through disability legislation, though it is through aged care legislation. Funding through community recovery packages is one pathway to ensuring no one is left behind. Community recovery packages for first responders, as a resilient ready activity to better understand the needs of persons with disability / NDIS participants, in an event of a disaster and conducting make safe activities, especially but not limited to evacuations.

Consultation question 3

What (if any) requirements/conditions should be placed on the activation of certain community recovery packages — for example, is the proposed 2-year timeframe for engaging a community recovery officer appropriate?

Council response

Council supports the proposed two-year timeframe as a minimum but strongly recommends flexibility to extend it for prolonged or compounding disaster events, consistent with Council's own experience that community recovery needs following Tropical Cyclone Jasper continued well beyond two years, with the funding support not extended as needed to better support community in building their disaster resilience.

Consultation question 4

How do current jurisdictional delivery methods differ, and what level of national consistency should apply to the standardised community recovery packages?

Council response

Council is not well placed to comment on delivery models in other jurisdictions and defers to the Queensland Government and other states and territories on that comparison.

On national consistency, Council supports the Discussion Paper's proposed approach of allowing states and territories to activate community recovery packages based on disaster impacts and community need, rather than applying a uniform response regardless of local circumstances. For activated packages, Council supports nationally consistent baseline eligibility criteria and payment principles to promote equitable treatment across jurisdictions, while allowing transparent, evidence-based loadings for remote, very remote or high-cost regions where recovery costs are materially higher.

Delivery mechanisms should also remain flexible, allowing each jurisdiction to determine whether assistance is best delivered by local government, state agencies or local not-for-profit partners based on existing capability, capacity and local circumstances.

Consultation question 5

What implementation challenges would jurisdictions face in transitioning to nationally standardised community recovery assistance?

Council response

The principal challenge is workforce capacity — community recovery officer and NFP support roles are difficult to recruit quickly following a disaster. Council recommends the Commonwealth support a pre-qualified panel or surge workforce arrangement that councils can draw on immediately following activation. Current models in place are for short-term support, through Council2Council programs and requests for assistance, medium to longer term support can be a challenge when transitioning to recovery, especially if events are occurring in neighbouring councils and other parts of the State. To better support the community, recovery and resilience action teams stationed through the incident management system would be of great benefit to Council’s and affected communities. Consideration of community recovery assistance provided directly to local government / local disaster management groups and local recovery and resilience groups is recommended.

Consultation question 6

What recovery elements of counter disaster operations are most important to states, territories, local government and communities, and how could these be delivered in the future to ensure support is provided seamlessly and for communities most in need?

Council response

Council strongly advocates for disaster funding arrangements that recognise Counter Disaster Operations (CDOs) as a critical investment in community safety and resilience. Local governments undertake essential response activities such as protective works, traffic management, temporary access restoration and debris clearance to protect lives and property, often before the full extent of impacts is known.

Experience consistently demonstrates that timely and effective CDOs reduce disaster impacts, support faster recovery and lower overall recovery costs. Funding frameworks must therefore provide certainty, clarity, and adequate support for these operations, recognising their vital role in protecting communities and enabling a seamless transition from response to recovery.

This is a material concern for Council. The Commonwealth's published materials confirm that the eligibility of Council's CDO costs under the DRFF remains unclear and is currently "subject to consultation". Given CDO funding forms a significant and recurring component of Council's disaster funding program—with Category B REPA costs alone accounting for $97.3 million of Council's $112.7 million in total DRFA support since 2018—unresolved eligibility represents one of the most significant areas of financial uncertainty for Council under the proposed reforms.

Council therefore recommends that CDO eligibility be clearly defined and supported by nationally consistent guidance, with funding arrangements that enable a seamless transition from response to recovery without gaps in eligibility or changes to evidentiary requirements. Council refers to the Australian Government Crisis Management Framework and highlights the timeframe identified as the crisis coordination of near term preparedness (readiness), response, relief and early recovery, including transition to recovery for CDOs.

Council recommendations

Council recommends that the Australian Government:

- include dedicated funding for community recovery hubs within the community recovery package;
- clarify the interaction between disability-related recovery support and the National Disability Insurance Scheme;
- allow flexibility to extend the two-year community recovery officer funding period for prolonged or compounding events;
- support a pre-qualified national surge workforce panel for community recovery and not-for-profit support roles; and
- clearly define eligible Counter Disaster Operations, publish nationally consistent guidance, and ensure a seamless transition between CDO and recovery funding, including recovery readiness.

7. Standardised packages: Local economic recovery

Council position

Cairns Regional Council supports the Australian Government's recognition that economic recovery is a critical component of disaster recovery. The recovery of local businesses, industries and employment is intrinsically linked to the restoration of public infrastructure and essential services. For regional communities such as Cairns, prolonged disruption to transport networks, utilities and community infrastructure can significantly delay economic recovery and have lasting impacts on local employment, tourism and investment.

Council also supports a stronger role for private-sector partnerships in disaster recovery. Effective recovery requires coordinated action across all levels of government, industry, infrastructure and service providers, and the broader business community. Future arrangements should enable earlier and more structured engagement with the private sector, leveraging local knowledge, capability and resources to identify recovery priorities, restore economic activity and strengthen community resilience. Embedding these partnerships within recovery planning would support faster, more coordinated recovery and better economic outcomes for disaster-affected communities.

Consultation question 1

Would these standardised packages help to create clear, easy to navigate arrangements?

Council response

Yes. The experience of Tropical Cyclone Jasper demonstrated that restoring public infrastructure including local roads, bridges, drainage networks and community facilities, was fundamental to enabling businesses to reopen, reconnecting supply chains and restoring confidence across the region. Council supports recovery arrangements that integrate economic recovery planning with infrastructure reconstruction, environmental rehabilitation and community recovery activities. Simplifying assistance measures should improve awareness, accessibility and administration. Noting that standardisation should not come at the expense of flexibility for unique regional circumstances (industries in regional economies vary significantly), therefore a one-size-fits-all approach may not adequately address the needs of communities with highly specialised industries. For instance, Cairns's general aviation sector was impacted significantly following Tropical Cyclone Jasper due to a number of premises located at the Cairns airport being inundated with water. Many of these businesses did not qualify for tourism or small business related recovery grants limiting their capacity and the capacity of the sector more broadly to recover.

Consultation question 2

How could risk reduction be incorporated effectively into standard local economic recovery packages?

Council response

Council recommends recovery grants explicitly permit small businesses and primary producers to invest a portion of grant funding in risk reduction and resilience measures (e.g. flood-proofing premises, relocating critical equipment) rather than strictly like-for-like replacement, as this is not efficient use of recovery funds. Ensuring the eligibility criteria is standardised will also reduce delays in accessing it, for these packages and enhance improved business preparedness and recovery readiness as one avenue for risk reduction at the local level.

Consultation question 3

Are there any suggestions for changes to current definitions for primary producers and small business that should be considered?

Council response

Council supports reviewing the 50 per cent primary production income test, consistent with the Discussion Paper's own acknowledgement that this threshold is difficult for diversified producers to meet, particularly following consecutive disaster seasons.

Consultation question 4

What level of administrative changes would need to be undertaken by state or territory delivery agencies to support program delivery with nationally consistent criteria?

Council response

Council defers to the Queensland Government on system-level changes but notes that any transition should preserve existing local business support networks (chambers of commerce, regional economic development bodies) as delivery partners.

Council recommendations

Council recommends that the Australian Government:

- recognise infrastructure restoration as a critical enabler of economic recovery;
- allow local economic recovery grants to be used for genuine resilience improvements, not only like-for-like replacement;
- Standardisation should not come at the expense of flexibility for unique regional circumstances as a one-size-fits-all approach is unlikely to adequately address the needs of communities with highly specialised industries or specific sectors uniquely impacted by particular disasters;
- review the 50 per cent primary production income test to better accommodate diversified producers; and
- preserve existing local delivery partnerships (chambers of commerce, regional economic development bodies) in any transition to standardised packages.

8. Standardised packages: Environmental recovery

Council position

Council supports the Australian Government's recognition that environmental recovery is an important, and currently under-recognised, component of disaster recovery. Natural environments underpin community wellbeing, economic prosperity and the resilience of public infrastructure. For regional communities such as Cairns, environmental assets, including waterways, coastal systems, wetlands, parks and urban landscapes, provide essential environmental, social and economic functions that are frequently affected by natural disasters.

Consultation question 1

What types of environmental recovery activities should be eligible under a DRFF standardised environmental recovery category?

Council response

Council recommends eligibility explicitly include waterway and drainage corridor stabilisation, removal of contaminated waste and debris from waterways, rehabilitation of coastal public land, and management of weed and pest outbreaks that commonly follow major flood and cyclone events. There appears to be no funding mechanism for vector management costs for a region susceptible to disasters, particularly flooding.

From TC Jasper, and mentioned in this response, environmental impacts linked to infrastructure were often deemed ineligible for environmental funding, even when the primary issue was environmental (e.g. erosion affecting parks, culverts, drainage features, and creek banks). This created confusion and left genuine environmental damage unfunded.

Consultation question 2

How should the framework distinguish between disaster-caused environmental damage, ongoing environmental management and broader resilience or conservation activities?

Council response

Council recommends eligibility be tied to a demonstrable, documented nexus between the disaster event and the specific damage, consistent with the approach already applied to infrastructure claims, rather than a separate and more subjective test.

From TC Jasper, funding focused on broadly defined environmental impacts rather than changes to environmental system function, making it difficult to distinguish between high-priority recovery needs and lower-value projects. The absence of a clear prioritisation framework and fundable project examples made it challenging to manage community expectations and justify investment in projects that delivered the greatest environmental recovery benefit.

Consultation question 3

How can First Nations knowledge, cultural heritage considerations and local environmental expertise be incorporated into assessment, prioritisation and delivery?

Council response

Council recommends environmental recovery planning explicitly incorporate consultation with Traditional Owner groups, particularly for waterway, coastal and land management activities where cultural heritage and Traditional Owner knowledge of Country are directly relevant to effective recovery outcomes. Council addresses First Nations engagement more fully under Section 11 of this submission.

Consultation question 4

What delivery timeframes, reporting requirements and evaluation measures would be practical for environmental recovery activities?

Council response

Council recommends shorter, simplified reporting for low-cost, quick-turnaround activities (e.g. debris removal), with more detailed monitoring reserved for higher-cost, longer-duration rehabilitation programs.

Lessons from TC Jasper showed that delayed funding meant some sites were repaired through alternative funding sources or operational budgets before environmental funding became available, reducing the value of the program.

Poor alignment with environmental recovery requirements: Funding timeframes did not align with practical revegetation and restoration windows, making some projects undeliverable and reducing recovery outcomes.

Pest and weed management funding included additional requirements introduced late in the process, with approvals received after planned project commencement dates.

Council recommendations

Council recommends that the Australian Government:

- explicitly include waterway stabilisation, contaminated waste removal, coastal rehabilitation and weed/pest management as eligible environmental recovery activities;
- apply the same disaster-nexus evidentiary standard used for infrastructure claims to environmental recovery claims;
- require environmental recovery planning to incorporate consultation with Traditional Owner groups; and
- scale reporting requirements to the cost and duration of the environmental recovery activity.

9. Standardised packages: Resilient infrastructure

Council position

Cairns Regional Council supports increased national investment in disaster resilience, consistent with the Colvin Review's own finding that, over a 27-year period under a mid-case scenario, an estimated betterment cost of $43.9 billion (net present value) would generate total economic benefits of $194.5 billion (net present value) — a return of more than four times the initial investment. This evidence supports expanding resilience investment, not reducing it.

However, Council does not support the proposed Resilient Infrastructure Scheme (RIS) as currently described, and has significant concerns that it would represent a substantial reduction in resilience funding compared to the current Betterment arrangements it is intended to replace. QRA's modelling of Council's five completed Betterment projects since 2013, approved for a combined $5,734,983 under the current Category D Betterment scheme, indicates only $2,907,615 would have been available for the same projects under the proposed RIS, a shortfall of $2,827,368, or approximately 49 per cent less funding for identical work.

Council's experience demonstrates that resilience outcomes are most effectively achieved when resilience upgrades are integrated into infrastructure reconstruction programs, allowing damaged assets to be rebuilt to a more resilient standard while communities are already recovering. A scheme that materially reduces available funding for this proven approach is inconsistent with the Government's own stated objective of increasing resilience investment.

Consultation question 1

What types of assets should be eligible for funding? Are there currently eligible assets that should be excluded? Should community, recreational and cultural assets be included?

Council response

QRA has undertaken financial modelling of the proposed reforms using Council's five completed Betterment projects, delivered since 2013 at a combined approved cost of $5,734,983. That analysis indicates that none of these five projects would have been fully funded under the proposed RIS eligibility criteria, despite each project demonstrably reducing future disaster risk and improving infrastructure resilience. Under the proposed 15 per cent-of-ERC RIS model, only $2,907,615 of funding would have been available for these projects, a shortfall of approximately $2.8 million ($2,827,368) relative to the Betterment funding actually approved. QRA's project-by-project analysis is provided at Attachment B to this submission. This outcome is inconsistent with the stated objective of increasing resilience investment.

Council also notes that the current DRFA Efficiencies Framework, which the DRFF proposes to remove entirely, with any difference between estimated and actual project costs to be returned to the Commonwealth, has delivered substantial resilience benefits across Queensland beyond individual project betterment. In Queensland, more than $700 million in DRFA savings have been allocated into statewide mitigation and resilience initiatives, including the $450 million Queensland Resilience and Risk Reduction Program, helping target investment towards jurisdictions facing the highest disaster burden and risk exposure.

Removing the Efficiencies Framework without an equivalent statewide mitigation mechanism under the DRFF represents a further, currently unquantified, reduction in Queensland's resilience investment capacity beyond the individual project impacts identified above.

Council strongly recommends that community, recreational and cultural assets be included as standard eligible assets. These assets are frequently central to community recovery and social cohesion following a disaster, and their exclusion under the current Category B/D framework has been a persistent source of confusion and delay.

Consultation question 2

Should the scheme use a cost estimation methodology to determine eligible claimable costs, or move back to actuals, or utilise a combination of both?

Council response

Council recommends a combination approach: an agreed cost estimation methodology for initial funding certainty and program planning, reconciled against actual costs at project completion, consistent with how Category B efficiencies claims currently operate. A pure actuals-only approach risks delaying funding certainty at the point councils most need it, before reconstruction begins.

Consultation question 3

What level of resilience/betterment can be achieved with the 15 per cent additional funding? Should there be minimum resilience standards linked to disaster risk (e.g. 1 in 100-year event)? What level could your jurisdiction manage within existing capacity?

Council response

Council's experience with its five completed Betterment projects indicates that 15 per cent additional funding is workable for moderate resilience upgrades (e.g. culvert and drainage capacity increases) but is likely insufficient for higher-order resilience measures such as full asset relocation or flood immunity upgrades to a 1-in-100-year standard. Council recommends the scheme retain flexibility for a higher co-contribution rate, on a case-by-case, value-for-money basis, for assets with a demonstrated history of repeat disaster damage.

Consultation question 4

How could disaster risk information be used to inform resilient investment?

Council response

Council recommends the Commonwealth work with states and councils to develop a shared, pre-populated asset risk register, so that high-priority, high-risk assets are identified before a disaster occurs rather than assessed individually after each event. These risk registers should also include consequence assessment data for each asset.

Consultation question 5

How could the new scheme align with normal state/territory infrastructure arrangements to create efficiencies?

Council response

Council recommends RIS assessment criteria be aligned, where possible, with existing state asset management and infrastructure planning frameworks, to avoid councils needing to prepare a parallel set of justifications solely for Commonwealth purposes.

Consultation question 6

Could pre-identification processes be used to speed up decision making — for example, pre-identifying key assets, at-risk or repeatedly damaged assets, potential resilience treatments, or pre-assessing value-for-money?

Council response

Yes. Council strongly supports pre-identification of repeatedly damaged assets and pre-agreed resilience treatments, which would materially reduce the time between a disaster event and the commencement of resilient reconstruction. Council notes several of its own assets have now been damaged and rebuilt on a like-for-like basis multiple times, and would benefit directly from a pre-identification approach.

Council recommendations

Council recommends that the Australian Government:

- broaden RIS eligibility criteria to retain the practical resilience outcomes currently delivered through Queensland's Betterment program, informed by the Colvin Review's own finding of a greater than four-times economic return on betterment investment;
- include community, recreational and cultural assets as standard eligible assets under the RIS;
- adopt a combined cost-estimation-and-actuals methodology, reconciled at project completion;
- retain flexibility for a higher resilience co-contribution rate, assessed case-by-case, for assets with a demonstrated history of repeat disaster damage;
- develop a shared Commonwealth–state–council asset risk register to support pre-identification of high-priority assets and resilience treatments; and
- align RIS assessment criteria with existing state infrastructure planning frameworks to reduce duplicated justification requirements.

10. Exceptional circumstances assistance

Council position

Cairns Regional Council supports the inclusion of an exceptional circumstances mechanism within the proposed disaster recovery framework. While nationally consistent funding arrangements are appropriate for the majority of disaster events, Australia's disaster landscape is increasingly characterised by complex, prolonged and high-consequence events that cannot always be effectively addressed through standard funding arrangements.

Council's own experience demonstrates the practical value of the current Category C and D arrangements that the exceptional circumstances category will replace. Since 2018, Council has been approved for $1,363,008 in Category C and D funding beyond Betterment, covering Flood Warning Infrastructure, Recreation and Community Assets, and Recovery and Resilience Grants (see Attachment C) and a further $3,998,771 in Category D funding administered through various State agencies (not detailed in QRA’s financial modelling). The Discussion Paper confirms that Category D exceptional packages will be removed under the DRFF, with 'additional support may be considered in genuinely extraordinary circumstances', however no detail has been provided on what constitutes genuinely extraordinary circumstances, nor on the types of support, consideration process or approvals that would be required. Council considers this lack of detail a significant gap that should be resolved before the DRFF takes effect.

Consultation question 1

Under what criteria should exceptional circumstances assistance be available?

Council response

Council supports the criteria proposed in the Discussion Paper (extent of loss of life/injury, scale of housing impact and displacement, disaster risk level, community vulnerability, frequency of repeat disasters, scale of impact on public assets, economic impact, complexity of concurrent/compounding events, and jurisdictional capacity), and recommends that the frequency, impacts and consequences of repeated disasters be given particular weight for regions such as Far North Queensland.

Consultation question 2

What types of assistance should be funded under the new exceptional circumstances category?

Council response

Council recommends the category explicitly preserve capacity to fund large-scale transformative risk reduction measures, such as home retrofitting or relocation programs, for communities facing genuinely catastrophic or repeat-disaster circumstances, consistent with current Category D practice. Flexibility is also essential, as what constitutes *exceptional circumstances* may not be known or anticipated before a disaster occurs. The nature and scale of each event, and the specific circumstances of affected communities, will determine what additional support is required. Funding guidelines must therefore be sufficiently flexible to accommodate unforeseen or emerging needs, the 'unknown unknowns', to ensure funding remains responsive and fit for purpose.

Consultation question 3

What indicators are likely to be available in a timely manner to support an impact assessment in exceptional circumstances?

Council response

Council notes that damage assessment data, insurance claim volumes and disaster declaration records are typically the most quickly available indicators, and recommends these be prioritised in any standard impact-assessment template.

Council recommends the development of damage and loss guidelines - economic and non-economic – in close partnership with Queensland Government. While impact data has been identified the data sharing protocols needs further work to be able to implement any best recovery practices for and with the communities.

Community and Economic Impact Assessments (and associated surveys) undertaken by local councils and State agencies should also be considered.

Consultation question 4

What requirements/conditions should be placed on exceptional circumstances assistance?

Council response

Council supports a detailed recovery plan requirement in principle but cautions that this should not delay urgent assistance; Council recommends an initial expedited approval pathway for time-critical measures, with the detailed recovery plan submitted for the balance of the request.

Council recommends exceptional circumstances assistance packages and standardised packaging are linked to forecast triggers in anticipation of an event and in anticipation of impacts and potential consequences.

No specific additional matters to be highlighted.

Consultation question 5

What timeframes should apply to requests for exceptional circumstances assistance?

Council response

Council recommends an initial request be able to be lodged within 90 days of the disaster event, with provision for a supplementary request as the full scale of impacts becomes clearer, consistent with the prolonged, multi-phase nature of many North Queensland disaster events.

For councils to best support affected communities, early action protocols is needed as a key resilient ready tool.

Council recommendations

Council recommends that the Australian Government:

- retain an exceptional circumstances mechanism, giving particular weight to the frequency of repeat disasters in high-exposure regions;
- preserve capacity to fund large-scale transformative risk reduction measures under this category, consistent with current Category D practice and embed appropriate flexibility within guidelines to adapt to the unique exceptional circumstances associated with individual disaster events
- adopt an expedited approval pathway for time-critical exceptional circumstances measures, separate from the detailed recovery plan process; and
- allow an initial 90-day request window with provision for a supplementary request as impacts become clearer.

11. Impact of disaster on First Nations People

Council position

Council supports the Australian Government's dedicated focus on the disproportionate impact of disasters on First Nations communities, and the commitment under Priority Reform 3 (Clause 64) of the National Agreement on Closing the Gap to engage with Aboriginal and Torres Strait Islander representatives before, during and after disasters.

As the regional centre for Far North Queensland and key transition hub, Cairns provides services to, and works alongside, a significant number of First Nations communities across Cape York, the Torres Strait and the wider region, several of which experience some of the highest rates of repeat disaster exposure in Australia. Council recognises that it does not speak on behalf of First Nations communities and that the matters raised in this section should be read as a local government perspective intended to support, not substitute for, direct engagement between the Commonwealth and First Nations representatives.

Consultation question 1

How are the recovery needs of disaster-impacted First Nations communities currently identified and prioritised in your jurisdiction?

Council response

Council's current approach is founded on existing relationships between Council, the Local Disaster Management Group (LDMG), and a range of community organisations and service providers, rather than a dedicated, disaster-specific engagement framework for First Nations communities. Community resilience and disaster preparedness initiatives are delivered through a whole-of-community approach, including engagement with culturally and linguistically diverse (CALD) communities and First Nations peoples. For example - following Tropical Cyclone Jasper, Council implemented community engagement activities across six localities identified as experiencing isolation during flood events: Machans Beach, Holloways Beach, Yorkeys Knob, Caravonica, Goldsborough, and the Babinda area.

Through resident-focused information sessions and workshops, these activities sought to capture lessons learned, strengthen local networks, and build community resilience. Broader community perspectives are also informed through partnerships and representation within the LDMG, including members from the Department of Families, Seniors, Disability Services and Child Safety, Queensland Health, the Northern Queensland Primary Health Network, and advisory input from the Department of Housing and Public Works.

Council recognises an opportunity to further strengthen engagement arrangements through the development of a more structured, collaboratively designed and pre-agreed engagement model. Such an approach would support more consistent and inclusive participation in disaster management planning, preparedness, response and recovery activities, while respecting existing community relationships and local contexts.

Consultation question 2

What gaps exist in current governance, funding and delivery arrangements for supporting recovery in First Nations communities?

Council response

Council recommends the Commonwealth give particular attention to: culturally appropriate emergency and temporary accommodation options; the practical and cultural implications of evacuation off-Country; the additional cost and time required to replace damaged goods and materials in remote communities; and ensuring hardship payment eligibility criteria do not inadvertently disadvantage community members without conventional forms of identification or address records.

As a regional hub for Aboriginal and Torres Strait Islander peoples, and with multiple Traditional Owner groups connected to land and sea Country within and around the Cairns local government area, Council considers it important that disaster recovery arrangements also support impacted people who may be living or displaced off-Country.

Consultation question 3

What opportunities, risks and implementation challenges should be considered when designing tailored recovery support for First Nations people?

Council response

Council supports the development of the National Indigenous Disaster Resilience Framework and recommends it be finalised, and implementation guidance issued, ahead of, rather than alongside, the broader DRFF rollout, given the framework directly informs how standardised packages should be adapted for First Nations communities.

Council also recommends that funding for First Nations-led disaster resilience initiatives, including cultural burning and other Traditional Owner-led land and water management practices with demonstrated risk-reduction benefits, be explicitly recognised as eligible activities under both the community recovery and risk reduction funding categories addressed elsewhere in this submission.

Council recommends further consideration of traditional knowledge to be applied to further enhance disaster related resilience.

Council recommendations

Council recommends that the Australian Government:

- finalise the National Indigenous Disaster Resilience Framework and associated implementation guidance ahead of the broader DRFF rollout;
- ensure hardship payment eligibility criteria explicitly accommodate community members without conventional identification or address records;
- recognise First Nations-led land and water management practices, including cultural burning, as eligible activities under the community recovery and risk reduction categories; and
- support the development of a structured, co-designed engagement framework between local government, the Commonwealth and First Nations community representatives ahead of, not only during, disaster events.

12. Streamlining data and reporting

Council position

Council supports the Australian Government's commitment to simplifying disaster recovery funding administration while maintaining appropriate accountability for public expenditure. Council's experience administering multiple DRFA reconstruction programs has demonstrated that significant administrative effort is often required to satisfy funding assurance requirements. While robust governance is essential, there are opportunities to streamline administration, reduce duplication and adopt a more risk-based approach that improves efficiency without compromising accountability.

Audit and assurance reform

Consultation question 1

What alternative models to the current two-step approach should be considered (e.g. a single Commonwealth-led audit, enhanced state audit with greater reliance, or hybrid approaches)? What are the advantages, risks and limitations of these models?

Council response

Council supports exploring a single, integrated audit model commissioned at the Commonwealth level with shared funding arrangements, as raised in the Discussion Paper. The principal advantage is removing the current duplication between state audit and separate Commonwealth assurance activities, which Council's experience shows extends timeframes and increases resourcing requirements without a corresponding improvement in accountability. The main risk is a loss of local/state contextual knowledge if the Commonwealth audit function is not designed with input from state and local delivery agencies.

Consultation question 2

How could roles and responsibilities be structured under different models to reduce duplication while maintaining clear accountability (e.g. risk-based assurance)?

Council response

Council recommends a risk-based model in which assurance effort is concentrated on higher-value or higher-risk claims (for example, Resilient Infrastructure and Exceptional Circumstances claims), with lighter-touch, sampling-based assurance for routine, lower-value reconstruction and hardship payment claims.

Consultation question 3

What changes would be required to data, systems and evidentiary practices in your jurisdiction to support alternative models?

Council response

Council recommends investment in a shared digital claims and evidence platform accessible to Council, the Queensland Reconstruction Authority and NEMA, to remove the current practice of the same supporting documentation being requested multiple times by different parties.

Council recommends a platform for impact and consequence assessments conducted by State Government to be made available following a disaster to reduce the time in accessing funding, especially in relation to recovery planning. Investment in pre-disaster data and post disaster assessments would also complement the recommended asset risk register.

Consultation question 4

What would be the key implementation challenges, transition considerations and impacts on delivery agencies, and how could these be managed?

Council response

Council recommends a transitional period in which both the current and new assurance models are documented and communicated clearly, with a single point of contact for delivery agencies to resolve uncertainty during the changeover. Where possible, a phased approach to ensure new models are embedded and lessons learned immediately to reduce any further bureaucratic bottlenecks to funding.

Evaluation reform

Consultation question 5

What would be the benefits, risks or practical challenges of evaluating recovery outcomes at the event level rather than by individual measures?

Council response

Council supports the proposed three-tier evaluation approach (event-level evaluation by jurisdictions, biennial Commonwealth meta-evaluation, and five-yearly independent system-level evaluation). Event-level evaluation better reflects how communities actually experience recovery, as a single, connected process, rather than as a series of disconnected individually funded measures. The main practical challenge is ensuring jurisdictions have consistent data collection capability to support meaningful event-level evaluation; Council recommends the Commonwealth provide a standard evaluation template and, where needed, funding support for smaller councils to build this capability.

Consultation question 6

What implementation support, guidance, templates or capability-building might jurisdictions need to transition to the proposed evaluation approach?

Council response

Council recommends a standard national evaluation template, worked examples from past events, and direct capability-building support for regional and remote councils with limited dedicated evaluation resourcing.

Consultation question 7

Are there any evaluation requirements under current DRFA arrangements that should be retained, removed or amended under the DRFF?

Council response

Council's recommendation on evaluation reporting is conditional on the future of the efficiencies mechanism itself. As set out elsewhere in this submission, Council opposes the abolishment of the DRFA efficiencies framework and recommends that it be retained or replaced with a genuinely equivalent mechanism. If the efficiencies mechanism is removed despite Council's position, the standalone program-level efficiencies reporting requirement should also be removed. However, if the mechanism is retained or replaced, associated reporting should continue in a streamlined, risk-based form.

More broadly, if the DRFF introduces additional recovery planning and evaluation requirements, appropriate funding should be made available to local governments to undertake these activities.

Evaluation should support continuous improvement, strengthen future recovery planning and build local disaster resilience, rather than create an additional unfunded administrative burden.

Council recommendations

Council recommends that the Australian Government:

- adopt a single, integrated Commonwealth-led audit model, designed with direct input from state and local delivery agencies;
- apply a risk-based assurance model that concentrates audit effort on higher-value and higher-risk claims;
- invest in a shared digital claims and evidence platform accessible to councils, the state and NEMA;
- adopt the proposed three-tier evaluation framework, supported by a standard national evaluation template and capability-building funding for regional and remote councils; and
- retain the standalone efficiencies reporting requirement if the DRFA efficiencies mechanism itself is retained; remove that reporting requirement only if efficiencies are removed from the DRFF, which Council otherwise opposes.

13. Risk reduction funding

Council position

Council welcomes the Australian Government's early engagement on a potential new risk reduction program to follow the five-year Disaster Ready Fund (DRF), which ends 30 June 2028. Council has directly benefited from DRF investment and strongly supports continued, and ideally increased, Commonwealth investment in proactive risk reduction, consistent with the Colvin Review's finding that the scale and impact of disasters are increasing and that compounding, cascading events are stretching communities across Australia.

Council notes that the DRF will allocate up to $142.5 million nationally by competitive application in 2026-27, distributed across all eight Australian jurisdictions. Council considers this level of funding, distributed nationally on a competitive basis, is unlikely to be sufficient to meet the scale of resilience investment needed in a single high-exposure jurisdiction such as Queensland, let alone within Far North Queensland specifically, and recommends this be a key consideration in designing the DRF's successor program.

Consultation question 1

How do you currently evaluate or measure the impact of your existing investments in natural hazard risk reduction?

Council response

Council does not currently apply a standardised methodology to evaluate or measure the impact of its investments in natural hazard risk reduction. Where impact is assessed, this occurs on an ad hoc, project-by-project basis rather than through a consistent, council-wide framework. Council understands this to be common practice across the local government sector more broadly, and considers it itself illustrates the case for reform: without a consistent, nationally available methodology, individual councils have limited ability to build a robust evidence base to support future investment decisions or demonstrate the value of completed projects. Council recommends the Commonwealth develop a standard avoided-cost methodology that councils could apply consistently, to build a stronger national evidence base for future risk reduction investment decisions.

Consultation question 2

How would you prioritise proactive risk reduction activities in your jurisdiction to efficiently reduce natural hazard risks for your most exposed communities? Do you have existing processes to do this?

Council response

Council prioritises risk reduction investment with reference to its asset risk profile, history of repeat disaster damage and broader natural hazard risk. This approach is increasingly being informed by integrated risk assessment and resilience planning that considers current and future hazard exposure, infrastructure vulnerability and potential consequences.

Council is currently undertaking detailed flood modelling and drainage management planning to improve understanding of current and future flood risk across the Cairns region, including flood hazard, inundation, flood isolation and the impacts of climate change across multiple time horizons. This work will inform Council's Integrated Natural Hazards Resilience Plan, which will identify and prioritise mitigation opportunities, resilient infrastructure investment, land use planning responses, nature-based solutions and other measures to reduce disaster risk.

Council considers that future Commonwealth and state risk reduction and resilience funding should align with the priorities and recommendations identified through robust, evidence-based local risk and resilience planning. Where councils have undertaken this work, there should be a clear pathway from risk identification and prioritisation through to funding and implementation. This would help ensure investment is directed towards locally identified risks and the measures demonstrated to deliver the greatest resilience benefit.

Council also supports greater consistency in the tools and methodologies used to identify and prioritise disaster risk. Council currently uses Queensland Government hazard and risk assessment tools through its Local Disaster Management Plan and has participated in recent work with the Queensland Government to test updated approaches. A nationally consistent methodology, supported by improved risk reduction tools, an appropriate disaster risk financing strategy and the proposed Outcomes Policy, would assist councils to identify, prioritise and communicate investment needs across all domains of disaster risk.

Council recommends that this approach ultimately support a shared Commonwealth–state–council understanding of priority risks and investment needs, enabling risk reduction, mitigation and resilient reconstruction funding to be planned strategically rather than through disconnected funding streams.

Consultation question 3

What are your views on specific areas of investment or cohorts which could be prioritised in a future funding approach, and types of funding processes (e.g. competitive grants or other alternatives) which would be most appropriate in your jurisdiction?

Council response

Council recommends priority be given to flood and storm tide mitigation infrastructure, drainage capacity upgrades and community facility hardening in communities with a demonstrated history of repeat disaster impact.

Council requires improved support and risk reduction tools which is innovative, a disaster risk finance strategy would be welcomed along with the proposed Outcomes strategy to best support Councils disaster risk mitigation efforts across all domains.

On funding mechanism, Council's experience with the current competitive DRF grants process is that funding uncertainty and the burden of preparing competitive applications can itself be a barrier, particularly for smaller councils. Council recommends the Commonwealth consider a Federation Funding Agreement or multi-jurisdictional agreement model for high-priority, pre-identified projects, reserving competitive grants for smaller or more discretionary initiatives.

Council recommendations

Council recommends that the Australian Government:

- develop a standard, nationally consistent avoided-cost methodology for measuring the impact of risk reduction investment;
- link future risk reduction investment to the shared Commonwealth–state–council asset risk register proposed under Section 9 of this submission;
- prioritise flood and storm tide mitigation, drainage capacity and community facility hardening in communities with a demonstrated history of repeat disaster impact; and
- consider a Federation Funding Agreement or multi-jurisdictional agreement model for high-priority, pre-identified projects, reserving competitive grants for smaller or discretionary initiatives.

14. Implementation timeline

Council position

Council supports a carefully managed, staged transition to any new disaster recovery funding framework. The proposed reforms represent the most significant changes to Australia's disaster recovery arrangements in many years. Successful implementation will require close collaboration between the Australian Government, state and territory governments and local government to ensure the transition is orderly, practical and does not disrupt existing recovery programs.

Consultation question 1

What practical considerations will be important to factor into the implementation timelines and transitional arrangements for both DRFF and any potential future risk reduction fund?

Council response

Council recommends existing DRFA projects continue to operate under the funding arrangements in place at the time of event activation, to provide certainty for delivery agencies and avoid retrospective changes to funding conditions.

Council also recommends the implementation timeline explicitly account for North Queensland's cyclone season (broadly November to April), so that any transition in systems or processes does not fall during a period of active disaster risk.

Consultation question 2

What timeframes do you estimate may be required (e.g. system changes, training, legislation, etc) to support the implementation of these reforms?

Council response

Council recommends a minimum 12-month lead time between final settings being confirmed and the new framework taking effect, to allow councils to update internal financial and asset management systems and train relevant staff.

Consultation question 3

Do you have any suggestions from a jurisdictional perspective on sequencing implementation or managing transition risk?

Council response

Council supports staging implementation, with administrative and assurance reforms (which carry lower transition risk) introduced ahead of the funding model and event-trigger changes (which carry the greatest financial risk for high-exposure jurisdictions), to allow issues to be identified and resolved before the changes with the most significant financial consequences take effect.

Council recommendations

Council recommends that the Australian Government:

- maintain existing funding arrangements for projects already activated under the current DRFA;
- sequence implementation so that transition does not fall during North Queensland's cyclone season;
- provide a minimum 12-month lead time between final settings being confirmed and the new framework taking effect; and
- stage implementation so that lower-risk administrative reforms precede the higher-risk funding model and event-trigger changes.

Summary of Recommendations

Cairns Regional Council supports the Australian Government's commitment to modernising Australia's disaster management and disaster recovery funding arrangements. Council recommends that the final framework retain the proposed direction of reform while refining the elements below to ensure the arrangements remain equitable, practical and responsive to Australia's diverse disaster risk profile. Recommendations are grouped by the Discussion Paper's own section structure.

Section 2 — Australian Government role and priorities

1. Explicitly recognise local government as a key delivery partner throughout disaster recovery.
2. Adopt an explicit no-worse-off guarantee for Queensland councils, communities and ratepayers as a design principle of the DRFF.
3. Retain the DRFA efficiencies framework, or replace it with a genuinely equivalent mechanism for statewide disaster mitigation and risk reduction investment.
4. Reject the proposed flat 50:50 funding model in its current form, and maintain a higher, disaster-frequency-weighted Commonwealth contribution informed by the AGA's own national cost projections.
5. Engage local government earlier in the design and implementation of recovery programs.

Section 3 — Event-based activation trigger points

6. Align event-based trigger point processes with existing Queensland disaster declaration arrangements.
7. Publish a real-time cost-tracking and notification protocol for trigger point status during an active event.
8. Reject the proposed $2.70 million Queensland trigger point and flat 50:50 model in light of Council's modelled $15.8 million (22 per cent) funding reduction, and consider an alternative model providing a higher Commonwealth contribution for high-exposure jurisdictions, reflecting disaster frequency, cumulative exposure and consequence rather than a uniform national figure.
9. Publish detailed grandfathering arrangements as a priority.
10. Confirm the ongoing eligibility of in-kind recovery assistance under the DRFF.

Section 4 — Standardised packages: Introduction

11. Adopt functionally described recovery categories in place of the current Category A–D structure.
12. Clearly and explicitly retain Counter Disaster Operations funding within or alongside the new functional categories.
13. Provide updated guidance and transition lead time before new categories take effect.
14. Release the recommended Outcomes policy identified in the Colvin Review, or consult with local government on its development, given its objective of ensuring disaster-related investment is scalable, sustainable, effective, equitable, transparent and accessible.

Section 5 — Individuals and families

15. Set national hardship payment levels with reference to the higher end of current jurisdictional practice.
16. Apply a remote area loading benchmarked against actual regional cost-of-living data.
17. Adopt simplified, self-assessed eligibility for emergency-stage payments.
18. Establish a single national intake point with Commonwealth–state data sharing.

Section 6 — Community recovery

19. Include dedicated funding for community recovery hubs.
20. Clarify the interaction between disability-related recovery support and the NDIS.
21. Allow flexibility to extend community recovery officer funding beyond two years for prolonged events.
22. Support a pre-qualified national surge workforce panel for community recovery roles.
23. Clearly define eligible Counter Disaster Operations, publish nationally consistent guidance, and ensure a seamless transition to recovery funding, including recovery readiness.

Section 7 — Local economic recovery

24. Recognise infrastructure restoration as a critical enabler of economic recovery.
25. Allow economic recovery grants to fund genuine resilience improvements, not only like-for-like replacement.
26. Ensure standardisation does not come at the expense of flexibility for unique regional circumstances, recognising that a one-size-fits-all approach may not adequately address communities with highly specialised or disaster-affected industries.
27. Review the 50 per cent primary production income test for diversified producers.
28. Preserve existing local delivery partnerships in any transition to standardised packages.

Section 8 — Environmental recovery

29. Explicitly include waterway stabilisation, contaminated waste removal, coastal rehabilitation and weed/pest management as eligible activities.
30. Apply the same disaster-nexus evidentiary standard used for infrastructure claims.
31. Require environmental recovery planning to incorporate Traditional Owner consultation.
32. Scale reporting requirements to the cost and duration of the activity.

Section 9 — Resilient infrastructure

33. Broaden RIS eligibility criteria, informed by the Colvin Review's finding of a greater than four-times economic return on betterment investment.
34. Include community, recreational and cultural assets as standard eligible assets.
35. Adopt a combined cost-estimation-and-actuals methodology.

36. Retain flexibility for a higher resilience co-contribution rate for repeatedly damaged assets.
37. Develop a shared Commonwealth–state–council asset risk register.
38. Align RIS assessment criteria with existing state infrastructure planning frameworks.

Section 10 — Exceptional circumstances assistance

39. Retain an exceptional circumstances mechanism, giving particular weight to the frequency of repeat disasters in high-exposure regions.
40. Preserve capacity to fund large-scale transformative risk reduction measures under this category, and embed sufficient flexibility within guidelines to adapt to the unique circumstances of individual disaster events.
41. Adopt an expedited approval pathway for time-critical exceptional circumstances measures, separate from the detailed recovery plan process.
42. Allow an initial 90-day request window with provision for a supplementary request as impacts become clearer.

Section 11 — Impact of disaster on First Nations People

43. Finalise the National Indigenous Disaster Resilience Framework and guidance ahead of the broader DRFF rollout.
44. Ensure hardship payment eligibility accommodates community members without conventional identification or address records.
45. Recognise First Nations-led land and water management practices, including cultural burning, as eligible activities.
46. Support co-designed engagement between local government, the Commonwealth and First Nations representatives ahead of disaster events, not only during them.

Section 12 — Streamlining data and reporting

47. Adopt a single, integrated Commonwealth-led audit model designed with state and local input.
48. Apply risk-based assurance concentrated on higher-value and higher-risk claims.
49. Invest in a shared digital claims and evidence platform.
50. Adopt the proposed three-tier evaluation framework with capability-building support for regional and remote councils.
51. Retain the standalone efficiencies reporting requirement if the DRFA efficiencies mechanism itself is retained; remove that reporting requirement only if efficiencies are removed from the DRFF, which Council otherwise opposes.

Section 13 — Risk reduction funding

52. Develop a standard, nationally consistent avoided-cost methodology for risk reduction investment.
53. Link future risk reduction investment to the shared asset risk register proposed under Section 9.
54. Prioritise flood and storm tide mitigation, drainage capacity and community facility hardening in repeat-impact communities.
55. Consider a Federation Funding Agreement model for high-priority, pre-identified projects.

Section 14 — Implementation timeline

56. Maintain existing funding arrangements for projects already activated under the current DRFA.
57. Sequence implementation so it does not fall during North Queensland's cyclone season.
58. Provide a minimum 12-month lead time before the new framework takes effect.
59. Stage implementation so lower-risk administrative reforms precede higher-risk funding model changes.

Conclusion

Whilst Council supports elements of the proposed reforms and recognises the importance of creating a disaster recovery framework that is simpler, more transparent, financially sustainable and focused on building long-term resilience, it strongly opposes any reduction in Commonwealth funding towards disaster recovery as any such reduction is likely to significantly compromise the effectiveness of such reforms regardless of their individual merit. An explicit 'no-worse-off funding guarantee' for local councils and communities must also be embedded as fundamental 'minimum threshold' principle in the DRFF as without it, it appears highly likely that local communities will be adversely impacted financially as a result of the proposed changes with such impacts being significant in disaster prone communities such as Cairns.

Council's submission also identifies several areas where the proposed framework could be strengthened to better reflect the realities of disaster recovery in highly exposed regional communities — in particular, refining the proposed event-based funding model to recognise differing disaster risk profiles, broadening the proposed Resilient Infrastructure Scheme to retain the successful principles of Queensland's Betterment program, ensuring the recovery needs of First Nations communities are addressed through dedicated engagement and funding recognition, reducing unnecessary administrative burden through risk-based assurance, and maintaining sufficient flexibility to respond to catastrophic and complex disaster events.

As one of Australia's most disaster-exposed local governments Council is committed to working collaboratively with the Australian Government, the Queensland Government and local government partners to develop a disaster recovery framework that supports stronger, safer and more resilient communities. Council appreciates the opportunity to provide this submission and looks forward to continuing to contribute to the implementation of a modern, nationally consistent disaster management framework.

Endnotes:

> *[1] Queensland Reconstruction Authority (QRA), Potential impacts of proposed Disaster Recovery Funding Framework (DRFF) on Queensland councils — Cairns Regional Council, data as at 23 June 2026 (Attachment A). The Tropical Cyclone Jasper (2023-24) figure reflects Council's total DRFA program cost for that event year of $81,155,904, of which $51,939,779 was recovered from the Commonwealth at the historical 64 per cent statewide average rate.*
>
> *[2] QRA, Potential impacts of proposed DRFF on Queensland councils — Cairns Regional Council, data as at 23 June 2026 ('Other changes proposed under DRFF'). This is a statewide Queensland figure, not specific to Cairns Regional Council's own DRFA program, and is cited to illustrate the scale of the efficiencies mechanism the DRFF proposes to remove.*

Attachment A: QRA Financial Impact Summary

Source: Queensland Reconstruction Authority (QRA), Potential impacts of proposed Disaster Recovery Funding Framework (DRFF) on Queensland councils — Cairns Regional Council, program data as at 23 June 2026. Figures for 2025-26 are based on submissions lodged with QRA to date and exclude any additional submissions still in development by Council. The 64 per cent 'Existing DRFA' recovery rate is the historical statewide average (2018-19 to 2022-23) based on Commonwealth data presented in the Colvin Report.

Council's DRFA program by event year, and modelled impact of the proposed 50:50 DRFF cost-share:

Event year	Events	Total Council DRFA program ($)	Existing DRFA @ 64% ($)	Proposed DRFF @ 50% ($)	Cost-shift to state/Council ($)
2018-19	1	4,707,619	3,012,876	2,353,810	659,067
2019-20	0	-	-	-	-
2020-21	0	-	-	-	-
2021-22	0	-	-	-	-
2022-23	1	4,723,834	3,023,254	2,361,917	661,337
2023-24	1	81,155,904	51,939,779	40,577,952	11,361,827
2024-25	1	18,307,777	11,716,977	9,153,889	2,563,088
2025-26*	1	3,801,098	2,432,702	1,900,549	532,153
TOTAL	**5**	**112,696,232**	**72,125,588**	**56,348,117**	**15,777,471 (−22%)**

** 2025-26 program values based on submissions lodged with QRA to date.*

The 2023-24 event year corresponds to Tropical Cyclone Jasper, referenced in the Executive Summary as approximately $81 million in total DRFA program cost (see footnote to the Executive Summary).

Attachment B: Council Betterment Projects Since 2013

Source: QRA, Potential impacts of proposed DRFF on Queensland councils — Cairns Regional Council (Att 1), data as at 23 June 2026. Of five Betterment projects approved for Council since 2013, totalling $5,734,983, none would have been fully funded under the proposed RIS eligibility criteria (15 per cent of Category B REPA estimated reconstruction cost). Available DRFF funding for these projects is estimated at $2,907,615, a shortfall of $2,827,368.

Event year	Project	Cat B REPA approved ($)	Cat D/E Betterment approved ($)	Betterment as % of Cat B	DRFF 15% criteria met?
2018-19	Goldsborough Road	784,432	773,884	99%	N
2023-24	Lake Morris Road	4,331,830	938,444	22%	N
2023-24	Goldsborough Road (Fisheries Crossing Bridge)	6,229,233	2,058,147	33%	N
2023-24	Barron Gorge Road	7,912,829	1,417,086	18%	N
2023-24	Ambulance Access Road	125,777	547,422	435%	N
		TOTAL	**5,734,983**		

Attachment C: Other Category C and D Funding Approved (Excluding Betterment)

Source: QRA, Potential impacts of proposed DRFF on Queensland councils — Cairns Regional Council (Att 2), data as at 23 June 2026. Total approved: $5,361,780 ($1,363,008 administered through QRA; $3,998,771 administered through other State agencies): These funding types may no longer be available in their current form under the DRFF, as discussed under Section 10 of this submission.

Event year	Program	Approved funding ($)
2018-19	Flood Warning Infrastructure (QRA administered)	296,493
2018-19	Recreation and Community Assets — LG and SD (QRA administered)	67,048
2023-24	Recovery and Resilience Grants (QRA administered)	999,468
2023-24	Category C/D funding administered through State agencies other than QRA	3,998,771
	TOTAL	**5,361,780**