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8 April 2011

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The Commissioners
Queensland Floods Commission of Inquiry
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Dear Commissioners

The Spatial Industries Business Association (SIBA) is concerned at the lack of understanding by various sectors of government and business of the issues behind the calls for better flood mapping.

SIBA is the peak private sector body representing companies involved in the collection and analysis of mapping data, which is referred to as spatial data and also digital elevation data amongst other technical terms. It is important that those assessing flood mapping failures understand the technical issues and solutions.

Much of the problem around the issue of inadequate flood mapping is due to our federated model of government. It is also due in large part to the inability of agencies at all levels of government to come to an agreement on the building of a National Spatial Data Infrastructure, which would at the very least improve discoverability of spatial data sets used in flood mapping.

We note the call from the insurance sector to have the Australian Government divest control of flood mapping data to the Bureau of Meteorology. This proposition assumes that the Bureau is best positioned to manage such data based on its current role in weather forecasting. There are many uses for high resolution spatial data of which flood mapping is but one. Planning is (or should be) the first use of such data and this need bears no relationship to weather data needs.

The private sector of the spatial industries currently collect much of the spatial data needs of Australia. This collection is usually done at the behest of stakeholder groups ranging from local, state and federal government agencies to utilities, insurers, transport, infrastructure organisations amongst many others. None of these stakeholder groups would necessarily have a spatial data need that relates to the Bureau of Meteorology functions.

Flood mapping deficiencies exist because no one sees this problem as important until there is a disaster - this applies to any natural disaster.

There are a host of appropriate agencies at the national and state levels of the bureaucracy that would have a greater role to play in mapping than the Bureau of Meteorology. At the national level the technical understanding of Geoscience Australia would be far greater than that of the

Bureau of Meteorology as they already deal with issues such as earthquakes and tsunamis. It is they who gather oceanographic data for sea level rise and inundation. They already have a wide understanding of the myriad of mapping technologies available today. The study of the earth's surface is a geophysical challenge rather than one of understanding weather events, which is only part of the flood inundation equation.

SIBA is of the view that the real issues around the adequacy of flood mapping are more complex than what has been reported in the media.

Fundamental to the issue is the need for accurate flood mapping that is:

- interoperable and standards-based
- at a resolution appropriate to the geographic area
- not a duplication of data that is already collected
- discoverable and accessible over the Internet
- is current and appropriately maintained
- cognizant of the requirements of all stakeholders including the private sector
- used to determine the impact of man-made structures within a flood zone on the natural flow of a river course

There is nothing in the above list to suggest neither that mapping data be centralized nor that it be owned and delivered by government. Location data is an infrastructure that is unique. It need not be fixed in position nor controlled by any one organisation. It can be private or public or both.

Clearly, government control of spatial data has not led to appropriate behaviours that could have minimized or even prevented the loss of property and lives in the recent floods. Perhaps it is time for the key private sector stakeholders to take responsibility for the collection and maintenance of high resolution location-based data or for there to be a collective agreement for an appropriate alliance of public sector and private organisations to ensure that the country gets the best mapping outcomes for all stakeholders; in the best interests of the community at risk.

If there is one thing that we can all be certain of it is that disasters will continue to impact on the nation. How we deal with those events is the real challenge. Getting the mapping question resolved will not prevent natural disasters but it help us to understand how better to prevent or mitigate property damage and the loss of life. An argument over who should pay the cost of data collection misses the point that such data is not only a benefit to emergency management but also a key infrastructure for nation building.

It is easy for us to level blame at the insurance sector as the most high profile target at this time of considerable grief. However, the insurance sector is a secondary player in the chain that begins with planning decisions of local councils and state governments. The insurance sector must determining risk after the fact; that is after a government or council has already approved development in a high risk zone. The questions that needs to asked are: *did the government or council use appropriate spatial data to consider risk before approving residential or commercial use zoning? And did the government or council ensure that the buyer was made aware of any risk?*

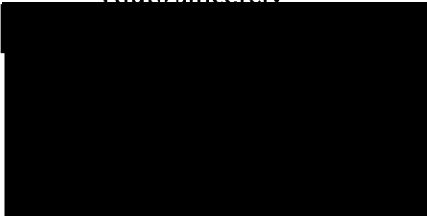
Furthermore, one can also draw on the vagaries of descriptive language such as *1:100 year floods*, which is misleading to the average consumer. Does this mean that a flood will occur every 100

years or is it possible that a significant flood event can occur twice in two years and still fulfil the 1:100 year measure?

Insurers are not the only sector facing challenges arising from inadequate or unavailable risk mapping data. Banks must also consider the impact on property values of an 'unexpected' natural disaster, which may depreciate the security relative to the loan value. The lack of insurance cover on a property may also render that property valueless through the inability of the property owner to borrow against a depreciated property value.

This inquiry must be prepared to consider the 'responsibility and liability chain' if it is to ensure that the outcomes and recommendations actually change behaviours for the benefit of the community as a whole. This Inquiry must find a way forward to ensure that the community is informed and knowledgeable about risk. This is fundamental to open government and open access to public sector information.

Yours sincerely



David Hocking
Chief Executive Officer