



**Senate Select Committee on Australia's Disaster
Resilience**

**Inquiry into preparedness, response and recovery
workforce models**

**Submission by Australasian Fire and Emergency Service Authorities
Council (AFAC)**

February 2023

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1 Introduction

The Australasian Fire and Emergency Service Authorities Council (AFAC) welcomes the opportunity to make a submission to the Senate Select Committee on Australia's Disaster Resilience inquiry into preparedness, response and recovery workforce models. The submission is based on consultation among AFAC membership as well as our broader understanding of the context of the inquiry.

We ask the Committee to note that the submission should not be taken as the position of any single AFAC member. Also, some of our members will have contributed through jurisdictional submissions, and nothing in this submission should be taken as implying that our members do not fully support their jurisdictional submissions where made.

AFAC leads the publication of national industry doctrine for fire and emergency services. Doctrine ranges from high-level, principles-based capstone material, through to technical guidance. Individual agencies make tailored decisions on how they apply this doctrine in their organisational context.

This submission begins with an overview of AFAC and its role within Australasian fire and emergency services (**Section 2**). **Section 3** is responsive to selected terms of reference of the Committee where AFAC considers it can usefully comment on them.

2 Overview of AFAC and its role

AFAC is the national council for fire, land management and emergency service authorities in Australia and New Zealand. AFAC represents 33 members and 25 affiliate members comprising permanent and part-time personnel and volunteers, totalling approximately 288,000 firefighters and emergency workers. The list of AFAC member organisations is provided in Attachment 1.

AFAC supports the sector to create safer, more resilient communities. We drive national consistency through collaboration, innovation and partnerships. We deliver enhanced capability by developing doctrine and supporting operations. AFAC has no direct role in the delivery of services to the community. AFAC also plays no role in representing its members in industrial matters.

Through our collaboration model¹, which encompasses 34 groups, technical groups and networks, AFAC assists the emergency management sector to identify and achieve strategic priorities. Collaboration occurs through sharing knowledge and exchanging insights, exploring opportunities and creating solutions. This approach enables AFAC members to consider common challenges, generate solutions, develop positions and inspire new directions in practice.

AFAC maintains a suite of doctrine publications² which articulates good practice based on the knowledge and experience of our members and informed by research where it is available. It is evidence-based, constantly reviewed and vested as the official view by the AFAC National Council and sector leaders.

AFAC representatives also participate in Australian and International Standards Committees. AFAC and Standards Australia are signatories to a Memorandum of Understanding in the development and revision of standards relating to the management of fire related risks, fire protection and fire safety.

¹ <https://www.afac.com.au/teams> retrieved 10 Feb 2023

² <https://www.afac.com.au/insight/doctrine> retrieved 10 Feb 2023

2.1 AFAC strategic directions

AFAC's work is guided by the *Strategic Directions for fire and emergency services in Australia and New Zealand 2022-2026*³. The *Strategic Directions* provide the fire and emergency services sector with a shared vision and a joint commitment to enhanced community resilience. It informs, clarifies intent and identifies the actions required at a national level for fire and emergency services in Australia and New Zealand. AFAC recognises that a collaborative approach is critical to achieving the *Strategic Directions* and gives fire and emergency services a national voice and broader impact, while enhancing collective capabilities.

The Strategic Directions are:

1. Supporting resilient communities through risk reduction
2. Providing a trusted response
3. Using credible and timely information and data
4. Safe, capable and diverse workforce
5. Informed by knowledge, innovation and research
6. Effective and transparent governance.

2.2 AFAC is a managing partner in the Australian Institute for Disaster Resilience

The Australian Institute for Disaster Resilience (AIDR) is the National Institute for disaster risk reduction and resilience. AIDR collaborates across sectors to strengthen the resilience of Australian communities to disasters. AIDR creates, grows, and supports a range of networks; provides opportunities for learning; development, and innovation; shares knowledge and resources to enable informed decision making and action; and facilitates thought leadership through national conversations.

AIDR is supported by its partners: the Australian Government National Emergency Management Agency, AFAC and the Australian Red Cross.

2.3 AFAC manages the National Resource Sharing Centre

AFAC established the National Resource Sharing Centre (NRSC) to develop and maintain the national Arrangement for Interstate Assistance (AIA); pursue collaboration opportunities with international jurisdictions; maintain the National Statement of Capability for Fire and Emergency Services and provide coordination support to jurisdictions involved in deployments. Since 2017 its value has been demonstrated on multiple occasions in supporting the management of large-scale incidents by facilitating interstate and international deployments.

³ https://www.afac.com.au/docs/default-source/publications/afac_strategic_directions_2022-2026_v1-0.pdf
retrieved 10 Feb 2023

2.4 AFAC maintains the Emergency Management Professionalisation Scheme

The Emergency Management Professionalisation Scheme (EMPS) exists to advance the cause of professionalisation in the practice of emergency management in Australia and New Zealand. EMPS is open to all emergency management personnel regardless of whether they are paid or volunteer, and regardless of the particular emergency management function they undertake. It provides credentialling, based on agreed national benchmarks, for proficiency in various operational aspects of emergency management.

2.5 AFAC is the custodian of the Australasian Inter-service Incident Management System (AIIMS)

AIIMS is the nationally endorsed system for managing incidents used by all fire, emergency service and land management agencies within Australia. AIIMS provides a common incident management system for all responding organisations and personnel, enabling seamless integration of activities and resources for the effective and safe resolution of any incident.

Through the application of AIIMS in training, exercising and incident response, people from fire and emergency services, government, not-for-profit agencies and industry have been able to build trust and confidence in each other's ability to work together and effectively manage the most challenging of incidents.

2.6 AFAC and the National Aerial Firefighting Centre

AFAC provides aerial firefighting resources on behalf of the States and Territories.

The National Aerial Firefighting Centre (NAFC) was formed in 2003 by the Australian States and Territories, with the support of the Australian Government, to provide a cooperative national arrangement for the provision of aerial firefighting resources for combating bushfires. Originally a separate company, NAFC is now a business unit of AFAC.

NAFC coordinates the leasing of a national fleet of specialised firefighting aircraft on behalf of State and Territory emergency services and facilitates the sharing of these aircraft between States and Territories during the fire season. The collaborative arrangements for the national aerial firefighting fleet have been instrumental in protecting communities and saving lives and property over past bushfire seasons.

NAFC also provides national systems to service aerial firefighting. For example, ARENA is a ground-breaking information system developed collaboratively with States and Territories to support effective management and administration of the fleet.

3 Comments on the terms of reference of the Senate Select Committee on Australia's Disaster Resilience inquiry into preparedness, response and recovery workforce models

AFAC's membership is made up of government fire, emergency and land management agencies whose principal responsibilities are prevention, preparedness and response. All response agencies recognise the importance of early integration of recovery into response activities, but jurisdictional allocations

of responsibilities for recovery activities vary. This submission is accordingly weighted towards issues relevant to response.

Equally, while AFAC member agencies work closely in many cases with civil and volunteer groups and not-for-profit organisations, and some such groups (for example, the Red Cross) are affiliate members of AFAC, AFAC's core business does not involve representation of those groups. While we can comment on the interface between government agencies and volunteer/not-for-profit groups, advocating for the specific needs of those groups does not fall within AFAC's remit.

Many state and territory fire and emergency services rely heavily on volunteer workforces, but we draw a distinction between public sector organisations fulfilling governmental responsibilities, with often significant budgets provided from jurisdictional revenues, and voluntary associations which are not based on legislative authority and rely on voluntary donations and grants for their income.

3.1 Responses to specific terms of reference:

(a) current preparedness, response and recovery workforce models, including:

i. the role of the Australian Defence Force in responding to domestic natural disasters

Support from the Australian Defence Force (ADF) has been provided over a number of decades through the Defence Assistance to the Civil Community (DACC) arrangements, and has contributed greatly to emergency response on many occasions. While not directly involved in firefighting, the ADF is ideally positioned to provide logistical support, and over the years has been invaluable in providing accommodation, facilities, catering, transport, engineering support, reconnaissance from the air and evacuating civilians from isolated townships. More recently, support has been provided using RAAF facilities as operating bases or for Large Air Tankers e.g. RAAF Richmond west of Sydney and RAAF Pearce near Perth.

The DACC arrangements allow some local support by ADF to agencies in areas directly adjacent to ADF facilities, under local arrangements. DACC allows for broader assistance under six categories, including emergency crisis response, and emergency recovery. The 2019-20 fire season had seen significant DACC support being provided in the context of the bushfire emergency. With the calling out of the Defence Reserve, up to 6,000 ADF personnel across Australia over January and February 2020 provided invaluable support in evacuation, relief and recovery. Following a recommendation of the 2020 Royal Commission into National Natural Disaster Arrangements (RCNNDA)⁴ the criteria for DACC being approved were modified to make it easier for the ADF to provide assistance without proof being required that other options had been exhausted: a pragmatic step which AFAC welcomes.

The RCNNDA noted a public perception that the ADF could assist in every aspect and was always readily available. THE RCNNDA was clear, however, that it did not consider this to be a reasonable expectation of the ADF. The key issue was identified as being that the ADF has finite capacity and capability. The capacity and capability of the ADF to respond to natural disasters can be affected by its commitment to its priorities, both domestic and international. The ADF should not, in the view of the RCNNDA, be seen as a first responder for natural disasters, nor relied on as such.

AFAC welcomes the involvement of the ADF in disaster response and recovery where assets are available and this is appropriate. We do not, however, support the ADF becoming involved directly in firefighting, and its involvement in other response (as opposed to recovery) roles depends on them already holding relevant skillsets and assets e.g. earth moving machinery for construction of flood

⁴ <https://naturaldisaster.royalcommission.gov.au/publications/html-report/list-of-recommendations> retrieved 10 Feb 2023

defences. While elements of the ADF could be trained and equipped for emergency response as part of their business as usual, there is a significant likelihood that this would duplicate existing state and territory capabilities and might not be regularly used, imposing a significant skills maintenance burden over and above the existing commitments of ADF personnel to maintain readiness for ADF operations. Furthermore, if the ADF was deployed ahead of local volunteers, it is foreseeable that volunteers would withdraw from providing their services, as the perception would be that this is now being provided by the ADF.

There was discussion in the media over the 2019-20 summer that the ADF should establish a 'disaster response command' to overcome the 'coordination' problems experienced this summer. AFAC is not clear what these coordination problems were, and is not convinced a command within the ADF would lead to these being overcome. The ADF establishment of a 'disaster response command' has every likelihood of duplicating the National Emergency Management Agency and would wind back the clock to the Defence 'Natural Disasters Organisation' in place many years ago. Such a suggestion fails to recognise the current arrangements put in place at a national level by state and territory agencies through AFAC for the coordination of national resource sharing, which as noted by the RCNDA operated effectively in the 2019-20 bushfire season, and have continued to be relied on by AFAC members to support a national response to the multiple consecutive flooding and storm events experienced across Australia since autumn 2021.

Our position is accordingly that the ADF plays a valuable role in supporting states and territories with emergency management activities, but it is not appropriate for the ADF to be constituted as a standing emergency response agency with specific obligations to respond to civil emergencies.

(iv) the role of Australian civil and volunteer groups, not-for-profit organisations and state-based services in preparing for, responding to and recovering from natural disasters, and the impact of more frequent and more intense natural disasters on their ongoing capacity and capability

AFAC's membership is made up of state-based government fire and emergency services and land management agencies. Our comments on this term of reference are accordingly made from the perspective of those agencies. As the committee will be aware, emergency response is constitutionally a responsibility of the states and territories and so AFAC members play the central role, enshrined in legislation and state emergency plans, of maintaining public safety and providing prevention, preparedness, response and some recovery services.

The workforce of AFAC member agencies is made up of career and volunteer personnel. Both make an invaluable contribution to the outcomes of AFAC members. It is a notable feature of the Australian fire and emergency service sector that a significant part of the government workforce in the sector is made up of volunteers. We do not, however, for the purposes of this submission, include AFAC members and their workforces under the rubric of 'volunteer groups', viewing that terminology as more apt to non-statutory, non-uniformed voluntary associations of individuals.

As the statutory authorities with responsibility, under the laws of the various Australian jurisdictions, for emergency preparedness and response, AFAC consider that its members are and should remain the backbone of emergency response in Australia and should be the vehicle through which continuous improvement is delivered. That is without prejudice to our earlier remarks about the value of the ADF, but that value should be realised in the context of incident management provided by AFAC members. Equally, not-for-profit and voluntary organisations, including spontaneous volunteers, have a significant role to play in supporting the efforts of government fire and emergency services, particularly in the area of recovery. Emergency response is a high-risk, high-consequence activity and

our view is that the statutory fire and emergency services are the appropriate entities to manage response activities.

AFAC has published a discussion paper which explicitly recognises the challenges for AFAC members in responding to more frequent, more severe events as a consequence of climate change⁵. The Bushfire and Natural Hazards Cooperative Research Centre (BNHCRC) also published two papers in recent years which noted challenges for sustaining the current emergency management workforce in the face of the impacts of climate change^{6,7}. These complexities are understood by the fire and emergency services sector, and given the implications for workforce planning and management AFAC suggests that statutory, publicly funded emergency services should continue to take the lead in providing organised emergency response services – whether delivered by career or volunteer workforces – into the future.

State and territory fire and emergency service agencies, in consultation with their governments, are responsible for identifying the appropriate levels of capability and capacity to respond depending on jurisdictional assessments of risk. In doing so, the potential availability of support from the third sector and the ADF can be taken into account. However, no jurisdiction could maintain a standing workforce large enough to deal with any conceivable event without seeking assistance. For this reason, AFAC members have put in place arrangements to share national capability and capacity to provide a truly national response to the largest events, as well as maintaining relationships with fire management authorities overseas that contribute to bushfire firefighting capacity in the worst fire seasons. Alongside evolving jurisdictional assessments of workforce capability and capacity requirements, the ability to share resources interstate and across the Tasman and Pacific represents an important element in the evolution of national capability to combat more frequent and intense disasters.

We identify a number of factors as important to support national capability, whether through collaboration between AFAC members, the voluntary sector and the ADF, or through sharing of resources across state and national boundaries. These include:

- Interoperability – organisations should be designed with the ability to work jointly in mind. This should not be an afterthought but should be at the heart of organisational policies and doctrine, in the voluntary sector as well as the public sector.
- Fit for purpose governance structures – in the voluntary sector it is important that appropriate governance is brought to bear to ensure that the organisation and its members can be effectively tasked and operate safely, with integrity, and in the public interest.
- Fit for purpose skills and surge capability – nationally recognised training for career and volunteer staff underpins the effectiveness of state and territory government organisations. In the voluntary sector, adoption of nationally recognised training will ensure fit for purpose and interoperable workforces. The ADF already uses nationally recognised training.
- Exercised and well tested cooperation – meaningful exercising can be complex to organise and expensive to deliver. The National Emergency Management Agency (NEMA) has recently established a national exercising capability, which should extend to include all organisations that are recognised as having a part to play in Australian disaster resilience.

⁵ <https://www.afac.com.au/docs/default-source/doctrine/AFAC-Climate-Change-Emergency-Management-Sector.pdf> retrieved 10 Feb 2023

⁶ https://www.bnhcrc.com.au/sites/default/files/02-2_implications_of_climate_change_for_emergency_services_operations_-_insights_from_the_literature_1.pdf retrieved 10 Feb 2023

⁷ <https://www.bnhcrc.com.au/publications/biblio/bnh-8351> retrieved 10 Feb 2023

- Common Incident management that scales – AFAC's Australasian Inter-service Incident Management System (AIIMS) is at the heart of Australasian fire and emergency service interoperability. It means, for example, that personnel from Western Australia can travel to Queensland and immediately slot into local incident management arrangements, understanding the functions and relationships they will be required to undertake. And as AIIMS is based on the USA's NIMS, personnel from the USA and Canada can also fit into Australian incident management arrangements without requiring additional training. All organisations that wish to play a formally recognised part in management of disasters and emergencies in Australia need to understand AIIMS and have appropriately trained people to be able to work within the AIIMS operating environment.
- Ongoing commitment to national standards – by using national training and national incident management systems, emergency management agencies across Australia are able to work together based on common standards. This extends to such things as standards for equipment and public information, with the Australian Fire Danger Rating System and the Australian Warning System examples of a national commitment to community safety.

(b) consideration of alternative models, including:

repurposing or adapting existing Australian civil and volunteer groups, not-for-profit organisations and state-based services.

In AFAC's view there is no undiscovered, alternative model for structuring emergency and disaster response that would provide previously unrealised benefits for the community. The current system provides an agile, community-based workforce for disaster and emergency response that is interoperable across the country and can be, and often is, deployed across jurisdictional boundaries to provide national resilience.

Organised and disciplined emergency response agencies should continue to be the backbone of disaster and emergency response in Australia. Complaints are voiced from time to time that 'head office' interferes with local response and that response agencies are unwilling to take risk: but that viewpoint has to be assessed against decisions made by jurisdictions over many years to legislate a health and safety culture in which organisational leaders face censure and punishment if their workforce is exposed to danger. Having taken that policy route, it would be inconsistent for governments to now take an approach that voluntary organisations should be allowed to undertake emergency response activities without the concern for the safety of their workforces and the community that has driven public sector organisations to increase the levels of training and oversight provided to their response workforces.

State and territory fire and emergency services provide appropriate levels of governance, discipline and training for their workforces while preserving a notably community-based volunteer workforce. There is no value in duplicating state and territory arrangements with a federal emergency response workforce, whether provided through the ADF or otherwise. If federal funds are available to strengthen Australian response capability and capacity, these should be disbursed by way of funding to existing entities that promote resilience such as the AFAC National Resource Sharing Centre, by funding activities that support national capability such as the development of a national deployment management system and underwriting the costs of interstate deployments of personnel and equipment, or by way of subsidies to state and territory agencies to provide improved training and equipment to their workforces.

A good model for this last proposal can be seen in the UK government's former New Dimension program, in which central funds were used to purchase equipment that could contribute to national resilience and response. Local agencies accommodated and could use this equipment for 'business as usual', but it remained subject to recall if required to combat national emergencies. By way of example in the Australian context, swift water in-water rescue capability has often been stretched in recent flood events. A nationally funded training and equipment program designed to increase this capability in state and territory agencies, on the understanding that this capacity would be made available for interstate deployment in case of need, would be one way to address this.

Equally, central government funding could be provided to voluntary or not for profit organisations that demonstrate that they meet a national capability need in the emergency management field. This could be made conditional on appropriate levels of governance, and training in and use of AIIMS as the national incident management system for fire and emergency services.

(c) consideration of the practical, legislative, and administrative arrangements that would be required to support improving Australia's resilience and response to natural disasters

Drawing together the threads from the above, AFAC advocates for working within existing arrangements rather than trying to create a new bureaucracy or layers of management for emergency and disaster response. A national fund earmarked for supporting emergency management capability development, with funding awarded under criteria that promote national capability and interoperability, could be administered from within existing federal government organisations rather than requiring radical change.

Australia's current disaster resilience model is not broken: inevitably with more frequent and more intense emergency events associated with climate change, more capability may be required to manage disasters, but this is not new or unimagined capability – rather, it involves building off the sound base that already exists. The concept that more resources might be required to deal with increased demand is a familiar and intuitive one. We would warmly welcome any move by the Australian government to contribute to the ongoing development of Australia's capability to respond to natural disasters, and we think that this is best done by reinforcing existing arrangements rather than trying to reinvent them.

APPENDIX 1: AFAC MEMBER ORGANISATIONS

Full Members (33)

Australian Capital Territory

ACT Emergency Services Agency
ACT Parks and Conservation Service

New South Wales

Fire and Rescue NSW
NSW Rural Fire Service
Forestry Corporation of NSW
NSW National Parks and Wildlife Service
NSW State Emergency Service
Surf Life Saving New South Wales

Northern Territory

Northern Territory Fire and Rescue Service
Northern Territory Emergency Service
Bushfires NT

New Zealand

Fire and Emergency New Zealand

Queensland

Queensland Parks and Wildlife Service
Queensland Fire and Emergency Services

South Australia

Department for Environment and Water (National Parks and Wildlife Service)
South Australian Fire and Emergency Services Commission
South Australia Country Fire Service
South Australian Metropolitan Fire Service
South Australian State Emergency Service

Tasmania

Sustainable Timber Tasmania
Parks and Wildlife Service
Tasmania Fire Service
Tasmania State Emergency Service

Victoria

Country Fire Authority
Forest Fire Management, Department of Environment, Land, Water, and Planning
Fire Rescue Victoria
Parks Victoria
Victoria State Emergency Service

Western Australia

Department of Fire and Emergency Services

Department of Biodiversity Conservation and Attractions, Parks and Wildlife Service

National

Air Services Australia

Department of Home Affairs, National Emergency Management Agency

Parks Australia

Affiliate members (25)

Ambulance Tasmania

Australasian Road Rescue Organisation

Australian Maritime Safety Authority

Australian Red Cross

Brisbane City Council

Bureau of Meteorology

Council of Australian Volunteer Fire Associations

Department of Conservation New Zealand

Department of Families, Fairness and Housing

Department of Health

Emergency Management Victoria

Geoscience Australia

Hong Kong Fire Services Department

HQPlantations Pty Ltd

Melbourne Water

National Emergency Management Agency (New Zealand)

National Biosecurity Response Team

National SES Volunteers Association

NSW Environment Protection Authority

NSW Volunteer Rescue Association

Pacific Islands Fire & Emergency Services Association

RedEye Apps

Resilience NSW

State Emergency Management Committee, WA

Surf Life Saving Australia