

Senate enquiry  
Airservices Australia  
ARFF  
2019

Dear Senators,

Thank you for making this enquiry possible, before now there was no way staff could communicate unsafe work practices, WHS failings, cost blow outs on infrastructure, failure to plan for growth and a culture of bullying or threats of code of conduct for asking questions.

I have been an ARFF firefighter for nearly 17 years and up until recently I held an internal portfolio position of WHS for Brisbane ARFF station. My role was to ensure compliance to legislation with WHS for everything at the station level only. I have resigned from this position because I do not believe Airservices follow the legislative requirements of the WHS act. Specifically, when unsafe work practices or unsafe systems of work are identified and raised, the first instance is not to investigate, however its to see what is happening at other stations or to cost out the consequences of making any changes nationally.

In my opinion, Airservices have hired specialist in the field of Law, WHS and HR etc whos job it is to ensure ARFF/Airservices is not liable or to minimise any change to how the business is run.

Failings in WHS surround the use of the online reporting tool Cirrus, too often serious reports are logged and closed with no change or outcome that satisfactorily provides a safe outcome. The Airservices WHS specialists have asked everyone to raise/ report as many Cirrus reports as possible. The sheer weight of raising a lot of minor issues gives the impression that Cirrus is a great reporting tool, the percentages of successfully closed Cirrus reports gives a false impression, when in truth the major hazards identified which are serious to staff health, are closed with outcomes which leave the staff bemused and confused. An example of this is on separate occasions years apart, the Cirrus reporting tool was used for Diesel Particulates inside the fire station building. On both occasions, staff were not properly consulted with or involved in the proper investigation and testing to be conducted contrary to the WHS act, the reason given in one meeting was "I have spent a lot of money already".

My opinion is that money and cost drive a lot of decisions in ARFF, the last Chief Fire Officer that took the capability of ARFF and staff seriously was Rob Porter back in 2005. Rob Porter was dumped from his position as Chief fire Officer and Andrew Clark took over and started implementing savage cost cuts across the business. This was also at a time when there was an internal management belief that ARFF was going to be privatised by the Federal government. During this time ARFF was "ring fenced" and run separately from Airservices as a stand-alone business unit. Money was tight and Fire Station managers had money taken back from their station budgets. Privatisation never occurred due to a change in Government in 2007, this however did not

stop the cost cutting with Andrew Clark now joined with many new management faces at his side all appointed to achieve the same outcomes.

A Cat 10 working group had meetings from 2002 through to 2007 when findings of table top exercises using task resource analysis which models an incident and the required manning and resources to satisfactorily complete it from start to finish.

As meetings progressed from 2002 through 2007, these findings were watered down due to existing staffing levels at stations, and a new determination within the ARFF management to use remission and/or internal determinations to provide the minimum within the guidelines of CASA. There was also a commitment to completing a staffing review into the future, which never occurred. The last time a staff review took place was around 1998.

With the natural growth in the aviation business, there came new technologies and changes in materials used to manufacture aircraft, and also with the changes in safe systems of work for fire fighters worldwide, this has meant that standard operating procedures have changed a lot. We have new procedures for all these occurrences, however there is no way we can follow our own procedures. We simply do not have the manning available for the new roles or to man resources effectively. Safe systems of operation and following Standard Operating Procedures are impossible due to a shortage in manning levels. Management have been told by staff on the floor in Brisbane that there is a manning issue with many unsafe work practices or an inability to follow procedures. Management consistently disagrees and ignores pleas to investigate while continually pointing to CASA documentation that states they are operating within the guidelines or benchmarked after various markers from overseas aerodromes. In one such meeting that occurred in February 2016, the Chief Fire Officer gave the Brisbane staff a briefing on future operating requirements, this meeting was recorded with the Chief Fire Officers permission. The recordings are now part of a transcript and on many occasions staff give accounts of unsafe work practices occurring and advise him that Standard Operating Procedures cannot be followed, and implore the Chief to investigate. The Chief throughout the meeting disagrees and denies that there is an issue with how we operate and meet our obligations to the MOS 139H.

Below I have randomly listed events or issues that highlight unsafe work practices or cost/budgeting wastage.

1. Airlines using the A380 configure their aircraft differently on three levels. Qantas have crew rest areas below the main deck, First and Business classes are on different levels depending on the airline, and showers on the upper level on Emirates and full size Apartments up front lower level with Etihad. Staff have to keep up with changing configurations.
2. The use of the remission factor, which is in use at most national aerodromes, was the result of another review, which was nothing more than a cost saving exercise. Aerodrome category is allowed to drop

one category level below an advertised level for each jet whilst still covering the larger aircraft movements, i.e. Cairns or Adelaide covering Cat 9 designated aircraft with Cat 8 manning and resources.

3. The amount of fuel carried I these larger jets at the larger aerodromes cannot be covered with the agent levels carried.
4. The low undercarriage on an A380 creates its own problems if access is required and this was covered in the 2002 meetings.
5. CASA need to be the Regulator and to ensure compliance is actually occurring. ICAO continually reviews and up dates their own documents and publishes the new levels or recommendations. Legislation needs to be passed to ensure CASA updates the 139H, accordingly when ICAO publish new recommendations.
6. ARFF have not had a staffing review since 1997 or 98, despite CASA asking them to conduct a staffing review 2010-12. Any internal reviews at a station level ARFF has conducted in years gone by, has always been about cost or privatisation, however safety has always been put to one side. A review to implement a fire drill in Brisbane and Cairns resulted in the removal of one person on crew, thereby compromising staff safety in being able to conduct safe fire ground operations.
7. There is practical evidence and experience during Operational Foam Workshops generation 1, that current staffing levels, vehicle agent levels are not at sufficient levels for current Cat. 9 or 10 operations and the proposed reductions at Brisbane and Perth, and the use of remission at other aerodromes will only compromise the safety of passengers, crew and Members.
8. Management is not performing a task resource analysis when issues of safety are highlighted and we cannot follow with our standard operating procedures. Management has shown a clear lack of due diligence and a duty of care for their staff. A task resource analysis, which is a requirement under ARFF, annex 14 for all new ARFF's, is only a recommendation for existing ARFF's to perform. Management have been advised of the problems facing ARFF with regard to following our own procedures and the short fall in manning and resources available to be able to not only perform these task, but to do it safely taking into consideration the fire fighters health and welfare. (CFO advised in meeting with Brisbane station staff In February 2016, the CFO gave permission for staff to record the interview and transcripts of the day are available).
9. Documented evidence suggests that a better funding model would allow for the smooth running of the ARFF business unit allowing ARFF to grow with the natural growth in the aviation industry. Future buildings like fire stations, vehicle purchases and fit for purpose equipment can be obtained and operated to ensure safe systems of work are continually met. The current CAPEX program and how money is spent or wasted,

- Newman station built with no planning done around mains electricity supply, diesel generator running 24 hours a day with a weekly cost of \$10k(needs to be validated). Solar panels and battery banks could have been installed.

<ul style="list-style-type: none"> <li>• Sydney station approved for upgrades and work starts, the original contractor goes bust and new contractor is brought in to finish the job with cost over runs due to old plans not being available.</li> </ul>
<ul style="list-style-type: none"> <li>• During senate estimates hearing, a list of stations was mentioned where money was spent without going through the appropriate approval channels. The Da Vinci Centre was on this list and it is not a fire station.</li> </ul>
<ul style="list-style-type: none"> <li>• Management not addressing the need to update procedures in line with domestic and international standards because they cannot fund it. Safe systems of operations with CABA will require more manning which ASA cannot address because they cannot employ enough staff and have them trained accordingly.</li> </ul>
<ul style="list-style-type: none"> <li>• Sydney boat shed, Sydney ARFF had a local supplier quote for the build which came out at \$75k. ASA procurement got involved and stopped it, the total cost using ASA project managers was \$750k. Unfortunately once the shed was completed it was discovered that the shed height measurements were out and the boat was too big to fit into it.</li> </ul>
<ul style="list-style-type: none"> <li>• Brisbane foam tank needs to be environmentally sealed. The cost quoted so far using ASA project managers is \$300k</li> </ul>
<ul style="list-style-type: none"> <li>• ASA lost the option of getting a preferred site for the new station with the assistance of BAC being able to put sand dredging at no cost to them. Now the unacceptable location of the new station is between drains in close proximity to the major taxiway and general aviation buildings, which will cause noise pollution for workers and when all BAC future buildings are built block the station from viewing large tracts of the aerodrome itself. The other consequence is that ARFF response times will not be able to be met, raising the distinct possibility that dispensation will be requested from CASA for a new building.</li> </ul>
<ul style="list-style-type: none"> <li>• A new station is built in Perth, issues are identified and renovations are required, plans from the new build are missing with cost blowouts in the millions.</li> </ul>

The ARFF business unit cannot continue in its present format as it is unsustainable, new resources are required, unsafe systems of work have been identified and need to be addressed, WHS issues with Diesel particulates and PFAS mean stations need to be renovated to have clean and dirty areas clearly identified. All this cannot be addressed under the current management who are only interested in cutting costs nationally.