Inquiry into the importance of a viable, safe, sustainable and efficient road transport industry

Senate Rural and Regional Affairs and Transport References Committee

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

1. Introduction

The Australasian Fire and Emergency Service Authorities Council (AFAC) welcomes the opportunity to make a submission to the *Inquiry into the importance of a viable, safe, sustainable and efficient road transport industry* (Inquiry). The submission is based on consultation among AFAC membership as well as our broader understanding of the context of the Inquiry.

We ask the Senate Rural and Regional Affairs and Transport References Committee (Committee) to note that the submission should not be taken as the position of any single AFAC member. Some AFAC member agencies will have contributed to the inquiry through jurisdictional submissions, and nothing in this letter should be taken as implying that our members do not fully support their jurisdictional submissions where made.

In providing the submission, AFAC remains ready to assist the Committee with its Inquiry and to answer any questions or expand on any concepts and suggestions made herein.

2. Background

About AFAC

AFAC is the national council for fire, land management and emergency service authorities in Australia and New Zealand, representing 31 member organisations, comprising permanent, part-time personnel and volunteers, totalling 288,000 firefighters and emergency workers. A full list of AFAC members is provided at Attachment 1.

AFAC engages with members through a collaboration model as well as event facilitation, professional development and influencing regulations and standards. It exists to support the fire and emergency service industry, making communities safer and more resilient. AFAC has no direct role in the delivery of services to the community e.g. the implementation of education programs or giving advice. It has no role in representing its members in industrial matters.

About the AFAC collaboration model

The work of AFAC is directed by the Strategic Directions for fire and emergency services in Australia and New Zealand 2017–2021. The Strategic Directions provide clarity on intent and identify and prioritise actions at a national level for fire and emergency services in Australia and New Zealand. AFAC recognise 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. AFAC facilitates national collaboration through the AFAC Collaboration Model, which encompasses 36 Groups, Technical Groups and Networks. AFAC members regularly come together to share knowledge, exchange insights, explore opportunities and create solutions that shape practice and guide the industry's development. The AFAC Collaboration Model aims to add value to AFAC Members, the fire and emergency services industry and ultimately enhance community safety. This approach facilitates and supports engagement, enabling members to jointly consider common challenges, generate solutions, develop doctrine including positions, guidelines and technical notes, and inspire new directions in practice.

The AFAC Collaboration model:

- produces national doctrine that aligns to the five Strategic Directions
- supports sector capability through contributing to learning and development initiatives
- develops and continually improves a national framework for incident management – the Australasian Inter-service Incident Management System (AIIMS)

- initiates and contributes to Australian and International Standards relating to fire related risks, fire protection and fire safety
- facilitates collaborative procurement of commonly used equipment, resources and technology required by AFAC Members
- encourages research development through cooperation with research partners, particularly the Bushfire and Natural Hazards CRC, and promotes research utilisation amongst agencies.

Strategic Directions for Fire and Emergency Services

Strategic Directions for Fire and Emergency Services in Australia and New Zealand 2017-2021 (referred to as the 'Strategic Directions') was first endorsed in 2013 by the Australia-New Zealand Emergency Management Committee (ANZEMC) and the then Standing Council on Police and Emergency Management (SCPEM). The five priorities articulated in the Strategic Directions have been broadly adopted across AFAC.

The five Strategic Directions are:

1. Supporting resilient communities through risk reduction
2. Providing trusted response and facilitating the transition to relief and recovery
3. The source of credible and timely information
4. Effective governance and resource management
5. Informed by knowledge and research

3. AFAC SUBMISSION

The development and maintenance of road transport infrastructure to ensure a safe and efficient road transport industry

According to the 2015 National Statement of Capability for Fire and Emergency Services, AFAC member agencies operate over 10,000 emergency service vehicles that are classified as heavy vehicles, the maintenance of road transport infrastructure is vitally important to enable AFAC member agencies to deliver services to the community. Almost all emergency services are delivered via the road network.

Infrastructure should be appropriately designed to ensure safety during fire scenarios and other emergency incidents. Future scenarios need to consider new technologies, such as electric and

hydrogen fuel cell vehicles. Infrastructure designs should also consider appropriate preclusion of Dangerous Goods from tunnels, given the identified risks to the motoring public and emergency responders.

The regulatory impact, including the appropriateness, relevance and adequacy of the legislative framework, on all stakeholders in the road transport industry

The impact to the emergency service sector from a prevention, operational response and fleet management perspective must be considered when developing legislative frameworks.

AFAC advocates for an exemption to the requirement to comply with the recording of time in a work diary for emergency service personnel. This is due to the infrequency of the driving duties, the training required including the skills maintenance in terms of being able to correctly fill in the log book and the cost associated with issuing work diary's that may only be used once or twice a year.

The impact of new technologies and advancements in freight distribution, vehicle design, road safety and alternative fuels

While new technologies and advancements can greatly improve vehicle design and public safety, while reducing environmental impact, many of AFAC member agencies operate vehicles over a 20-year period. This can increase the timeframes for benefits realisation that these new technologies may bring to the emergency services sector and needs to be taken into account with new technology requirements. For example, any mandated requirement for heavy vehicles to have ABS braking systems could not be achieved in the sector in a short time frame, without significant additional investment by government.

The additional risks that these new technologies pose, for example electric motors and high output batteries during a fire or other incident, should be appropriately addressed as they can be very challenging to make safe. The best procedure for handling of damaged batteries is still largely unknown.

As is currently the case with vehicles that are gas converted which have specific identification on number plates, electric vehicles, particularly as they are being produced by multiple manufacturers, should also have a specific marking to identify that they are electric, or hydrogen powered. This will allow first responders to implement appropriate protocols, particularly if the vehicle is on fire.

The social and economic impact of road-related injury, trauma and death;

The Australian Automobile Association (AAA) is the peak organisation for Australia's motoring clubs and commissions research and develops in-depth analysis of issues affecting transport systems. This includes affordability, road safety and vehicle emissions.

From 1 July 2018 to 30 June 2019, there were 1,214 deaths on Australia's roads. Under the National Road Safety Strategy, Australian governments agreed to reduce road deaths to less than 1,000 per year targeting a 30 per cent reduction in road-related serious injuries between 2011 and 2020.

The AAA Road Safety Platform, launched in early October 2019 after industry consultation including AFAC, outlines the transport safety policies of the AAA and aims to list the priority areas to be considered by the Federal Government to address road safety management. The AAA met with 16 national transport, health, research and emergency services bodies to finalise the Platform. While the cost estimate does not include time and services of volunteers, who provide the vast majority of road crash rescue in rural areas, AFAC is of the view that the total cost in response to road accidents for emergency services of $336.5m as cited in the document, is significantly underestimated.

Road Crash Rescue is a critical service delivered on a daily basis by emergency response agencies providing extrication and emergency life support services. Data coordination, harmonisation and collation will continue to be a focus to inform road safety policy.

Safety considerations for communities and emergency service personnel

In line with AFAC's position on *Fire Safety in the Built Environment*, the highest priority for mitigation or intervention actions should be the protection of life, both of the community and emergency service personnel.

- The primacy of life for the community is a fundamental priority, together with protection of property, the environment and business continuity.
- In all cases, the primacy of life of responding personnel should be an equally high priority for the road transport industry and government when developing strategy, policy and legislation.

In addressing this priority, AFAC advocates for the minimisation of risk to responding personnel as far as reasonably practicable.

Advocating for industry partnerships and collaboration

AFAC encourages the development and enhancement of strong relationships and partnerships with the regulatory and transport industries, to utilise synergies and develop road safety alongside governments, regulators and industry. Where at all possible, AFAC will encourage our members to work towards a nationally consistent approach to engagement with regulators and industry.

Importance of data collection and research-based decision making

AFAC encourages engagement, contribution to and participation in research and relevant data gathering, to build the body of knowledge in relation to advancements in freight distribution, vehicle design, road safety and alternative fuels.

AFAC advocates for effective collection, monitoring and utilisation of relevant data by member agencies and with other industries. This will assist in informing research that supports advocating for regulatory change. Data and subsequent strategies need to be continually assessed as to their relevance and effectiveness, due to the rapidly emerging nature of technology in the industry. This is to be underpinned by sustainable approaches that consider social, economic and environmental impacts.

AFAC conducts an annual collection of a specified set of incident data, aggregating this data in a national database (AIRSNAT). AFAC is the current custodian. This includes data relating to transportation-related incidents. By design however, the focus of the recorded data relates to the activity undertaken at the scene by emergency services and not the cause of the incident.

Because AIRSNAT data is focused on response activities, not causal analysis of motor vehicle-related incidents, we encourage AAA and its members to seek opportunities to partner with organisations and Government departments that already collect causation-related data. AFAC is currently preparing a data strategy, advocating for the accurate collection, analysis and sharing of incident data to lead to more effective community outcomes. It is anticipated that this will substantially increase the amount and relevance of data collected by AFAC member agencies that relates to the causes of transport accidents.

References

Australasian Fire and Emergency Service Authorities Council 2018. Fire Safety for Road Tunnels (AFAC Publication No. 3003). AFAC, Melbourne, Australia.

Australasian Fire and Emergency Services Authorities Council. (2019) Fire Safety in the Built Environment (AFAC Publication No. 2047). East Melbourne, Vic: Australia. AFAC Ltd

Australian Automobile Association (2019) Reviving Road Safety, Federal Priorities to Reduce Crashes and Save Lives. Canberra, ACT, Australia.

Commonwealth Attorney-General's Department & Australasian Fire and Emergency Service Authorities Council (AFAC) (2015) 2015 National Statement of Capability for Fire and Emergency Services, East Melbourne, Australia

Attachment 1

AFAC Members

January 2019

Full Members

ACT Emergency Services Agency

ACT Parks and Conservation Service

Airservices Australia

Bushfires NT

Country Fire Authority, Victoria

Department of Biodiversity, Conservation and Attractions WA, Parks and Wildlife Service

Department for Environment and Water, SA

Department of Fire and Emergency Services, WA

Department of Home Affairs, Emergency Management Australia

Fire and Emergency New Zealand

Fire and Rescue NSW

Forest Fire Management Victoria - Department of Environment, Land, Water and Planning

ForestrySA

Forestry Corporation of New South Wales

Metropolitan Fire and Emergency Services Board, Melbourne

Northern Territory Fire, Rescue and Emergency Service

NSW Rural Fire Service

NSW State Emergency Service

Office of Environment and Heritage, NSW

Parks Australia

Parks & Wildlife Service Tasmania

Parks Victoria

Queensland Fire and Emergency Services

Queensland Parks and Wildlife Service

South Australian Country Fire Service

South Australian Metropolitan Fire Service

South Australian State Emergency Service

Sustainable Timber Tasmania

Tasmania State Emergency Service

Tasmania Fire Service

Victoria State Emergency Service

Affiliate members

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

Emergency Management Victoria

Geoscience Australia

Hong Kong Fire Services Department

HQ Plantations Pty Ltd

Melbourne Water

Ministry of Civil Defence and Emergency Management

National SES Volunteers Association

NSW Environment Protection Authority

Office of Bushfire Risk Management, Western Australia

Office of Emergency Management NSW

Pacific Islands Fire & Emergency Services Association

South Australian Fire and Emergency Services Commission

State Emergency Management Committee, WA

Surf Life Saving Australia