

Attn: Members of the Senate Inquiry.

I would like to first take the opportunity to convey my thanks for this opportunity to share, briefly, concerns I and others have with the Management of Airservices, with particular interest toward the Aviation Rescue and Fire Fighting service.

I would also like to offer my feelings toward the wider discussion of provision of ARFF services at Airports, in that, I believe the actual provision runs deeper than just the nuts and bolts of a fire tender, or the bodies that fill their seats... It is also about the actual health and wellbeing of fire fighters present and training every day for various possible accidents and scenarios. The management of fire fighter health and wellbeing is of very real concern across the workforce as we see real concerns ignored and no action taken over reported hazards and occurrences.

As per terms of reference my submission touches on points: (c), (d), (g) & (i).

I have been employed within ARFF for 8.5yrs as a Fire Fighter. 4yrs of this has been as an elected Health and Safety Representative of the workgroup at Brisbane ARFF.

Topics of concern:

- 1. Safe Systems of Work**
- 2. CIRRIIS – Corporate Integrated Risk and Reporting System**
- 3. Very high local management turnover**
- 4. Consultation**
- 5. Diesel Exhaust Emissions/Particulate Matter (DPM)**
- 6. Distress Signalling Units (DSU)**
- 7. Large Mock Up training aids (LMU)**
- 8. Mould**

1: SAFE SYSTEMS OF WORK

Of great concern is the way Airservices has been consistently trending to reduce fire fighter numbers at many locations. Here in Brisbane we have been placed in the potentially compromising situation of having to 'cross crew' to cover CAT 10 movement times, despite the 'iron clad' guarantee that this would not happen in Brisbane. Despite this, we find the aircraft landing and departing outside the advertised times and more frequently than management advertise we have had to commit our Domestic response vehicle to an incident thus reducing our effective manning during CAT 10 times to below the advertised 14 staff. Perth also is subjected to the concerning cross crewing method, and recently Adelaide has been under review to see their minimum numbers reduced. This causes very real stress among fire fighters around the country and also extends to our families – We should not have to endure such stress about our personal safety at work when it is clear what staffing numbers are not just required but also anticipated in the event of a full aircraft incident.

Compounding our safety concerns is the fact that Airservices will not allow drills at our large mock up training ground in Melbourne with the lowered crewing numbers, including cross crewing models. This is mind boggling as without the ability to train in exercises that more closely reflect the reality of crew numbers on station we are being left potentially exposed to a higher degree of safety risk should a large-scale incident occur.

2: (CIRRIS)

A lack of faith in Air Services internal reporting system exists among fire fighters around the country. This is primarily due to the unreliable way in which the reporting system is administered and the way reported hazards, incidents and potential occurrences are consistently closed without consultation with the person raising the report, without solutions being investigated or implemented, and in recent months evidence of personnel testimony within CIRRIS's being changed by managers without the consent of the individuals who raised them, this was not even meant to be possible. Consistently we are asked to utilise CIRRIS so that safety can be better managed, however in practice there is no evidence of this occurring, too often our safety specialists seem to focus more on the collection of statistics and isolated incidents instead of tuning in to the very real and concerning safety concerns being raised by fire fighters on the ground. One could easily feel that the safety specialists eyes are more focused on 'cheap' fixes than actually finding the 'right' solution to safety concerns within ARFF.

Summary:

- Lack of transparency of the CIRRIS system
- Serious CIRRIS's can and have remained open for months and years
- CIRRIS not used as advertised or intended to identify and improve the safety of staff and the organisation.

Evidence of Reports being altered by management to reduce the severity of actual hazard contamination occurrence to fire fighters.

3: High Local Management Turnover.

Within the last 8yrs in Brisbane there has been an astonishingly high turnover of Local Operations Managers, about 7 in 8yrs as well as a couple of interim ones. This has added to the anxiety of the local workforce in regards to slow remedial action of identified problems at a local level. Specific concern revolves around a Local managers desire to effect much needed change and improvements, but being refused support, finances and required infrastructure. I believe it highlights a greater problem within upper management levels.

4: CONSULTATION

There exists within Airservices Australia a real problem with communication and consultation. Many, many times issues, concerns and hazards are identified to management with little to zero engagement and return consultation. This has been extremely consistent and evident within my space as the local elected workplace health and safety rep in Brisbane. Communication and consultation all too often have unfortunately been relegated to dictation from various levels of management. This problem is compounded by a lack of engagement from our WHS regulator ComCare.

5: Diesel Exhaust Emissions/Particulate Matter (DPM)

One of the biggest concerns to me as a young fire fighter is the issue of Diesel Particulate Matter (DPM) contamination throughout both stations at Brisbane airport, Main and Satellite stations. It has become a major topic of concern among the full work group I represent as an elected HSR. Concerns have been raised in Brisbane and other ARFF stations around Australia regarding station contamination, of particular concern is the fact, as can be evidenced over many years, that the Fire Tender Diesel emissions are leaking into most 'clean areas' station wide i.e. Mess rooms, B.A. rooms. Locker and bathrooms etc... This just should not be happening in this day and age. Significant scientific work has taken place and many papers published both internationally and nationally to provide concrete evidence that Diesel emissions should be treated with the utmost seriousness. This is best highlighted by the World Health Organisations reclassification of Diesel emission as a CLASS 1 Carcinogen – meaning it has KNOWN links to certain cancers including lung and bladder cancer. However, within Air Services there has been displayed a disgusting lack of acknowledgement of the scientific evidence and the practical evidence of contamination at individual station level. There has, in 2018, finally been testing done in Brisbane, however as can be evidenced our concerns and input were flagrantly ignored, consultation was not forthcoming from the involved ARFF managers and specialists and consequently the proper testing methods were not employed or followed.

Under the WHS Act we endeavoured to have the regulator, ComCare, to investigate where upon ComCare's final report dismissed concerns and the need to meet the minimum testing standards and also ignored the fact that Brisbane's extraction system falls almost 50% below the minimum Australian Standard.

Diesel Exhaust Emissions contain a complex mixture of gases, vapours, liquid aerosols and particulate substances. These substances are the products of combustion.

The main chemical constituents of diesel exhaust emissions are:

Carbon (soot)
Water (H₂O)
Carbon monoxide (CO)
Carbon dioxide (CO₂)
Nitrogen (N₂)
Oxides of nitrogen (NO_x)
Oxides of sulphur, e.g. sulphur dioxide (SO₂) Alcohols
Aldehydes
Ketones
Various hydrocarbons (HC)
Polycyclic aromatic hydrocarbons (PAHs)

A Summary of short comings are as follows:

- Diesel Particulate Matter settling on surfaces around stations, including clean areas.
- Satellite Station not tested.
- Exposure Standards for individual chemical components of DPM not tested for.
- Surface testing not conducted
- Personal monitoring of select staff not conducted.
- ComCare investigator negligent in his duty to research the issue, admitted multiple times in meetings that his knowledge of DPM was very low.
- Mitigating measures put in place in Brisbane not adequately controlling DPM contamination of station.
- Failure to Eliminate or reduce exposure to carcinogens by using recommended controls.

- Standard Procedure in Adelaide is to repaint the engine bay to hide the evidence of Diesel soot, turning the ceiling from light black to white – ignoring the real issue of poisoning staff.
- CIRRIIS reporting not being engaged effectively by management in collaborative communication, risk assessment and resolution process.
- Photo's attached of the deplorable contamination of 2 stations within ARFF – symptomatic of most stations condition.

6: Distress Signalling Units (DSU)

Of great concern is the age of our distress signalling units and the complete contempt that the safety of front-line staff is being shown with the inaction of management to implement DSU's that comply with current Standards.

ARFF DSU's are approximately 15yrs old and out of compliance by two regulatory standards. Their initial life span was 7yrs, at which time ARFF applied to CASA for a dispensation so that a plan for replacement could be formulated and rolled out. CASA agreed and granted the dispensation, with certain proviso's – one of those being that if any service in Australia rolled out a new DSU that met the new regulations then ARFF would have to follow suit and immediately begin replacement of old DSU's. Despite the fact that this very thing did happen with other Fire Fighting services upgrading their DSU's to comply with new Reg's ARFF ignored their duty of care and went against CASA's requirements. Unfortunately, CASA did not hold them to account for their actions, Instead ARFF applied to have the need for further dispensations waived, and CASA obliged.

Summary:

- ARFF DSU's are 9yrs out of service life.
- Deaths have occurred in other services because of the direct failure of the model ARFF are still currently using.
- Because of these deaths, new Regulatory requirements were put in place to ensure a higher safety standard.

7: Large Mock Up Training Aids (LMU)

It came to my attention that the state of our local LMU in Brisbane was not being properly maintained in line with both industry best practice and Airservices' own maintenance policy., which required most notably an inspection by a qualified structural engineer. I went back ten years looking for maintenance records, asking up the chain of command and responsibility for these records – They did not exist because qualified inspections were not being carried out. This search and 'run around' went on for 18months I am disappointed to say, with all of our concerns and requests for the required structural engineers' inspection being ignored. That is, until one day during a standard drill one of the LMU's wheel assemblies became detached by a monitor shot from our fire tenders, approx. 200kg of steel flying off the LMU structure and hurtling across the training ground. Thankfully it did not hit anyone, but only by sheer good fortune! This finally caught the full attention up the line of management and earnest discussion ensued.... And went on for far too long, at which time it became necessary for the elected HSR's to issue a Provisional Improvement Notice (PIN) on the LMU in line with the WHS Act. Finally, a structural engineer was sourced by management and a report submitted detailing extensive wear and safety critical repairs were advised. Obviously, this would come at a cost, and the complicated nature of decision making, cost centre defining and permissions found finally amounted to the required safety critical repairs being completed.

I wish I could say that a lesson was learned by management and the proper mechanisms were re-established and adhered to, alas, unfortunately this has not been the case, and it has continued to be a constant battle to ensure the safe maintenance of our Training Rig and consequently the safety of all fire fighters training there from around the country. After the very next Inspection date, it took 6wks to get hold of the report through Airservices Property department, and when read it clearly stated 6 safety critical repairs were required! This had been totally 'missed' or ignored by Property and in the process every fire fighters personal safety was again jeopardised, and again a part of the LMU was dislodged from the main structure, this time the opposite wheel, thankfully there were no fire fighters out of the fire tenders to be hit. Thankfully our new Local manager took the initiative to close the LMU until the identified safety critical areas had been repaired, also changing the previous 12 monthly inspection to a 3-monthly inspection. However, when this next 3-month inspection time arrived, Property dept. were reluctant to get it done... We are currently working through this.

Summary:

- Poorly maintained state of the LMU raised through proper channels via WHS reps in 2014.
- No action to inspect or repair until 2018.
- On 2 separate occasions solid steel wheel assemblies have become disconnected from the main structure during fire training exercises.
- Constant battle for the inspections to be carried out.
- Constant battle to obtain the report from inspections.
- Property Department have shown a consistent disinterest in this area and consequently played Russian roulette with the safety of all fire fighters training at the LMU.

8: Mould

Early 2018, Brisbane had a drastic mould outbreak, time and again as the WHS Rep I met with management to consult on the issue, health risks for staff and what action would be taken. Unfortunately, the issue bounced around management for some weeks while the fire fighters on the floor were being exposed to mould spores, of which the seriousness only became known later. Approximately 4wks of no action went by when we were asking for intervention by way of testing the spores and an industrial clean of the affected areas – in line with industry recommended remedial action. Unfortunately, our Local Operations Manager was trying to get a generic commercial clean with vinegar and bleach. Traction was finally gained when our EGM at the time, Michelle Bennetts came to Brisbane for a visit and sat in on our WHS meeting for that month, at which time we walked EGM Bennetts and our LOM around the affected areas of the station – to which EGM's Bennetts was appalled at the extent of mould around the station and approved the necessary testing and cleaning. Tests came back that the Mould present could not be commercially cleaned and the entire room to be stripped back and renovated entirely, most items within the room could not be cleaned and were condemned to the bin.

Summary:

- If not for a fortuitous visit from the EGM we would have continued to be ignored and subjected to contamination and inhalation of mould spores in that room.
- Upon reflection by crew, many staff members had been suffering health troubles as a likely result of exposure to the mould spores.
- Hospitalisation of member due to mould spores in the lungs.
- Photo's attached of Mould contamination.

- Other rooms with mould present were not cleaned as per mould report, merely painted over in one instance (mould presence can still be seen under paintwork) or ignored in the case of our Fire Control Centre.
- Mould has now started to appear in our dormitory at the Main Fire Station in Brisbane, with no effective remedy or industry recommended practice being used to remove.
- Once again, real safety concerns of staff ignored.
- Suspected aversion from management to test and fix the problem due to cost of fixing the problem.

In summary I would like to contend that there is a very disappointing level of care and concern for the genuine safety and wellbeing of fire fighters within ARFF and the organisational mechanisms are only smoke and mirrors that do not serve to protect the safety concerns, interests and future wellbeing of staff.

I would like to extend mine and my families sincere thanks for providing this opportunity to have our concerns heard.

Kind Regards,

Tim Limmer
Aviation Rescue and Fire Fighting
Brisbane
WHS Elected Rep
United Fire Fighter Union Aviation Branch
Union WHS Co-Ordinator.

















