

Western Australian Volunteer Fire and Rescue Services Association (Inc)
Response to Ferguson Report – July 2016

Given the importance of Recommendation 15 to the membership of the Western Australian Volunteer Fire and Rescue Services Association (Inc) “WAVFRSA” or “the Association”; we have commenced our response to the Ferguson Report with this recommendation.

Recommendation 15: *The State Government to create a Rural Fire Service to enhance the capability for rural fire management and bushfire risk management at a State, regional and local level. The proposed Rural Fire Service will:*

- *be established as a separate entity from the Department of Fire and Emergency Services (DFES) or, alternatively, be established as a sub-department of the Department of Fire and Emergency Services;*
- *have an independent budget;*
- *be able to employ staff;*
- *have a leadership structure which, to the greatest degree possible, is regionally based and runs the entity;*
- *be led by a Chief Officer who reports to the responsible Minister on policy and administrative matters; and to the Commissioner for Fire and Emergency Services during operational and emergency response;*
- *have responsibilities and powers relating to bushfire prevention, preparedness and response; and*
- *operate collaboratively with the Department of Fire and Emergency Services, the Department of Parks and Wildlife (P&W), Local Government and volunteer Bush Fire Brigades.*

In creating the Rural Fire Service, the State Government to consider whether back office and corporate support services could be effectively provided by an existing Department, such as the Department of Fire and Emergency Services or the Department of Parks and Wildlife.

The State Government to review the creation of the Rural Fire Service two years after its establishment, to assess whether its structure and operations are achieving the intended outcome.

Response:

The WAVFRSA is not supportive and vehemently opposes the creation of an independent Rural Fire Service and makes the following submission to the Premier, Department of the Premier and Cabinet and the Minister for Emergency Services.

The WAVFRSA strongly believes that the creation of yet another firefighting service will not serve the communities of Western Australia any better than the current arrangements. There are currently two State Government departments (DFES and P&W) who undertake firefighting in WA. There is also approximately 120 Local Governments (LG) who are responsible for local Bush Fire Brigades (BFB) and fire response within their locale.

The WAVFRSA acknowledge that this structure is unwieldy and has caused a great deal of friction, particularly during the last five years. We also believe it is unacceptable to have one position responsible for fire in WA (FES Commissioner) whilst having multiple agencies

undertake operational response with differing approaches, training and resources. For the betterment and scale of efficiencies for WA's communities, all fire services (both response and mitigation) should be the responsibility of one agency to ensure the governance of training, resourcing and approaches to incident management are all aligned.

In 1954, the Western Australian Government established the Bush Fires Board of WA (BFBWA) to manage bushfire prevention and response on private property. The government had already established the WA Fire Brigades Board for management of all fires within town sites across the State. In 1998, both Boards were amalgamated into the Fire and Emergency Services Authority (FESA) to consolidate firefighting responses and simplify the process. FESA was transitioned into the current DFES structure in 2012 following the release of the Keelty Review into the Perth Hills fires (recommendation 46).

The Ferguson Report promotes a myopic view that having a separate agency will prevent future incidents such as the Waroona/Yarloop fires. This assumption is seriously misguided and obviously flawed given that New South Wales, Victoria and South Australia all have separate fire agencies, authorities or departments that manage bushfires. These states have all experienced significant fires over the past decade that have destroyed hundreds of properties and claimed many lives.

Eastern states fire jurisdictions have historically experienced (and, in fact continue to experience) serious issues with a lack of cooperation and accountability between agencies. The Association believes that reverting to another independent department to manage bushfire in Western Australia will only add further confusion and separation of responsibility within our state. In addition, a recent review of Victorian fire services recommended the reinstatement of the Chief Fire Officer position as the head of each fire service (Metropolitan Fire Brigades and Country Fire Authority) and the establishment of a single governing board for the CFA and the MFB; although this recommendation was rejected by the State Government.

It is our considered opinion that the escalation of fires to catastrophic events over recent years can be largely attributed to:

- A lack of a 'tenure blind' state-wide hazard reduction burning (HRB) program, especially in areas identified as "high risk".
- HRB program performance targets that do not include rolling over previous year shortfalls.
- Generally poor fuel management practices by private landowners.
- Delays in advising DFES that an incident being managed by either P&W or LG is likely to escalate to a Level 3 incident. This includes delays in transferring control that impedes the time DFES has to implement an effective operational response and emergency management structures.

The majority of WA's BFB are managed by their respective LGs, with some recently ceding responsibility to DFES. Whilst some LGs take this responsibility seriously and do a good job in managing their local BFB, there are a significant number that view the management of volunteer BFBs as not forming part of their core business. This is often reflected in the less than ideal operational standards, both of equipment maintenance and training of their brigades.

Following the second Keelty Review into the Margaret River fires, DFES undertook consultation processes to determine how BFB members felt about transferring the responsibility for brigades from LGs to DFES. Due to negative comments – mostly around the use of the word “control” rather than “responsibility” – and undue influence of committee members of the Association of Volunteer Bush Fire Brigades (AVBFB), many BFB members responded negatively to the survey. The WAVFRSA believe that many of these comments were motivated by the desire of certain committee members to return to the former Bushfire Board structure.

The WAVFRSA strongly believes the State’s BFB should be transitioned across to DFES. This would ensure that all BFB members are trained and maintained to a standard which is consistent throughout the state and would encourage improved cooperation between agencies.

The AVBFB are over represented in the Ferguson Report and their members have been quick to make accusations and pass judgement about DFES performance and in particular the FRS. It is also of some concern, to both the WAVFRSA and our members, that so much credence is attributed to an organisation that purports to represent the members of the Bush Fire Service when no fees are paid by that membership. The AVBFB has simply adopted the approach of “if you are a BFB, then we represent you”.

The AVBFB committee generally believe that both volunteer and career FRS personnel have no place in bushfire management or suppression. This false assumption is archaic and is not supportive of a holistic firefighting effort across the state. The constant denigration of both DFES staff and FRS personnel has been the primary catalyst for the escalation of mistrust and causes unnecessary heightened tensions between these services and members of the BFS.

On a number of occasions, the AVBFB have repeated variations of the “resilient communities” theme in which they state that BFB must be managed by their LGs to ensure resilient communities in the future. They contend only BFB members are involved in their communities. This position is fallacious, mischievous and misguided as all VFRS members live and are fully involved within their communities. Many of our members undertake multiple volunteering positions within their communities and in some situations are also members of their local BFB.

Our main concerns regarding the creation of an independent Rural Fire Service are:

- There has been no consideration of where the country FRS (88 volunteer Brigades and four career stations) would fit into the proposed structure.
- The significant financial implications associated with establishing a new agency; including the duplication of existing DFES bureaucracy (procurement, finance, human resources etc).
- Scarce funds being used to set up a separate RFS could be better spent equipping identified VFRS Brigades in high risk areas to enable a faster and more effective response in the early stages of an incident.
- The creation of an RFS will not improve general operational response (FRS “business as usual” activities such as road crash rescue, hazardous materials incidents, structural fires etc.) to regional communities. This model could in fact reduce the funding available to ensure responses are effective – especially in time sensitive responses such as road crash rescue.

- Put at risk consistent training standards, appropriately equipped and fit for purpose appliances.
- It will create an even larger divide between FRS and BFB members than currently exists through differing standards and qualifications thereby making interoperability more difficult at large incidents.
- Isolation of metropolitan BFB network from regional counterparts.
- The possibility of mixed messages being provided by different departments. This would especially be an issue in larger regional centres where media advertisements and community service announcements are taken from metropolitan outlets.
- The costs associated with establishing and maintaining an RFS model would be significant and an unreasonable impost on metropolitan rate payers. Metropolitan communities already account for approximately 85% of the ESL funds collected annually.
- The creation of an RFS will not solve the issues currently being experienced around prevention and mitigation activities.
- The Special Inquirer suggested a BFB could opt out of management by their LG and be managed by DFES. This model poses risks that further exacerbate an already complex operational management and response capability. There could theoretically be up to six (6) different firefighting services reporting to diverse command structures.
- The model supported by the AVBFB still maintains management of BFB by individual LG.

A number of issues around the interoperability between FRS and BFB have been highlighted during recent major incidents, including:

- There are no standardised qualifications for an individual to be appointed to the Chief Bush Fire Control Officer (CBFCO) position by a LG. In fact, there is no legislative requirement for them to have any qualifications at all. A number of these positions are held by Rangers with no training in fire operations. The tasking of CBFCO's as sector or divisional commanders then becomes problematic due to a lack of consistent training, qualifications or experience.
- Lack of awareness by BFB members of the limitations of some FRS vehicles when operating outside of urbanised areas. Many FRS "heavy" appliances are not designed for off-road operations (other than well-defined gravel or limestone tracks). This led to significant abuse of VFRS members by BFB members during the Waroona/Yarloop incident because of their "refusal to go off-road and put out a fire in a paddock". These appliances are, however, better suited for their primary role of rural urban interface operations.
- Lack of urban firefighting knowledge and skills of BFB members who waste time and water trying to extinguish a fully engulfed structure instead of saving nearby exposed structures.
- Refusal to comply with the command and control structure as per the Australasian Inter-service Incident Management System (AIIMS) utilised by fire services across Australia. It is frustrating for incident controllers (and those FRS crews waiting for relief crews to takeover) when a crew is tasked with a specific role and the CBFCO or taskforce leader makes a unilateral decision to undertake a different task. They are operating in an information void and simply reacting to localised trivial issues. The WAVFRSA has been advised that this occurred on at least two occasions during the Waroona/Yarloop bushfire.

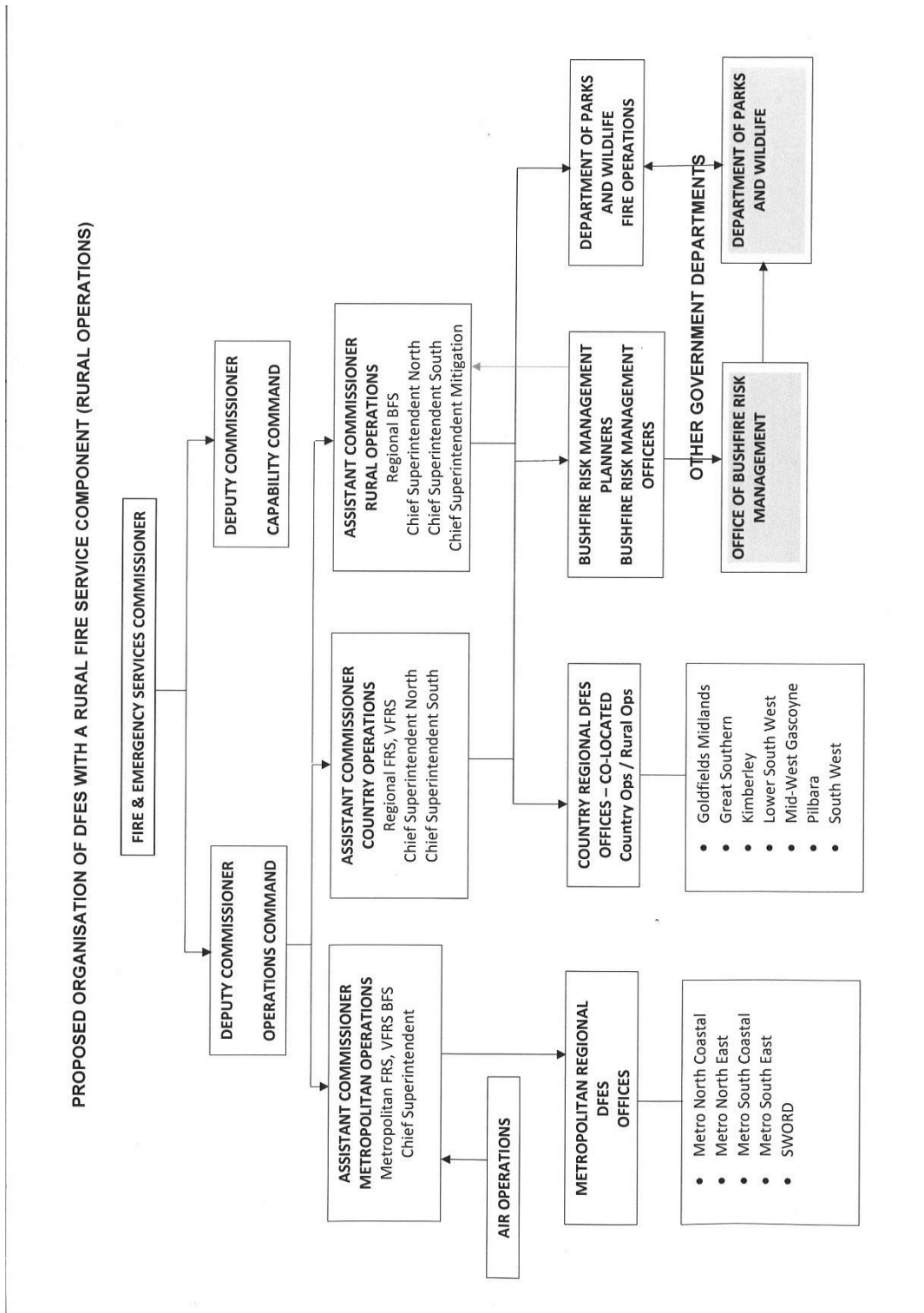
- Instances of self-mobilisation of BFB crews who do not report to incident control points for instructions and do not complete “T-cards” to provide the incident controller with important details on the number of crew, officer in charge, time arrived on the fireground etc. These same crews consequently complain to media outlets or local members of parliament that DFES ignored them and did not relieve them adequately or provide meals/refreshments whilst on the fireground. It is very difficult to provide welfare arrangements for crews not registered through the agreed protocols. This is also a serious ‘duty of care’ and ‘occupational health safety and welfare’ issue and occurs regularly during major incidents. In addition, whilst the HMA for this incident was the FES Commissioner, the controlling agency was P&W, who remained remarkably quiet and distanced themselves from the issue when this criticism was being directed towards DFES.
- Little or no respect for FRS qualifications and competencies when fighting landscape fires. Yet statistics show that FRS Brigades or stations (career and volunteer) were mobilised 3,596 times to 4,485 incidents during 2015/16. At the same time, the BFS were mobilised 1,481 times. This information dispels the false assertions that FRS crews are not skilled in bushfire operations.

The WAVFRSA believe the following organisational model would provide Western Australian communities with a more efficient, and sustainable firefighting service:

1. Create a “Rural Operations” portfolio within the Operations Command of DFES – in addition to the “Country Operations” and “Metropolitan Operations” portfolios already in existence that cater for the Fire and Rescue Service (both career and volunteer); who undertake a large variety of roles in addition to attending landscape fires. Each of the operational portfolios would be the responsibility of an Assistant Commissioner reporting to the Deputy Commissioner – Operations Command.
2. Remove all responsibility for BFB from individual LGs and have them report directly to “Rural Operations” where they would assist in hazard reduction burns and other mitigation activities as well as being an operational resource during the bushfire season.
3. Make “Rural Operations” responsible for all mitigation activities and planning in rural areas – including the transfer of responsibility for the Bushfire Risk Management Planners and Bushfire Risk Management Officers from DFES Capability Command.
4. Transfer responsibility for P&W firefighting operations to “Rural Operations” whereby firefighters would assist with mitigation activities on Crown, Unmanaged Reserves and LGs lands during the off-season and become operational firefighters during bushfire season.
5. Transfer and expand the responsibility and legislative powers of OBRM to SEMC Secretariat to ensure they are able to audit mitigation requirements, in a tenure blind approach, across Western Australia. This will include being responsible for creating processes required to conduct hazard reduction burns (removing the responsibility from Local Governments, and ensuring all processes are the same across WA).
6. Adequately and appropriately fund LGs to allow them to continue to ensure mitigation works are undertaken within their boundaries; by private, corporate or government landholders. This would see all three components of mitigation separated and ensure accountability – process/audit (OBRM), mitigation activities

(Rural Operations) and appropriate mitigation works being completed in a timely manner (LGs).

7. Ensure all processes, procedures, communications are delivered across all portfolios and are not specific to one agency (such as the AVL being utilised by DPaW, but not DFES and the use of WebEOC by DFES and not by DPaW).
8. Transfer the State Operations Centre to Operations Command.
9. Transfer air-operations to Operations Command to ensure all operational capabilities are found under one roof.



The WAVFRSA makes special mention of the section titled “The Volunteer Voice” on page 249 of the report. In this section, the Special Inquirer makes comment on the “relationship between the Department of Fire and Emergency Services and Volunteers”.

The Association is extremely disappointed that no mention is made of any other fire volunteer service except the BFS – who are not the responsibility of DFES (except in an operational sense where DFES is the lead agency) and are under the control of their respective LGs. It is difficult to comprehend how the Special Inquirer can mention the “volunteer voice” in WA without at least talking to members of each of the volunteer firefighting services. This is further supported by commentary made by the SES Volunteer Association on both fire operations and natural hazard issues. It is apparent that only the disenfranchised groups were provided a voice, however, volunteer stakeholders who could provide balanced and objective viewpoints were ignored.

Members of the FRS – both Volunteer and Career – have worked collectively and collaboratively utilising the “command and control” structure with the “trust and respect” principle espoused by the AVBFB for many decades. It is extremely disappointing that they continue to marginalise and denigrate our membership through comments in the general media, social media and via submissions to these types of inquiries. Their constant call for “trust and respect” at the expense of “command and control” is operationally irresponsible and dangerous.

The WAVFRSA also find the Special Inquirer’s comments on Page 257 of the report perplexing, given his final recommendation on the creation of a Rural Fire Service:

Whilst the creation of a new Government Department may be the first option to arise in any discussion of a new fire service, the Special Inquiry acknowledges that it may not be the most effective way to deliver the outcomes intended. A number of unintended consequences may arise from the creation of a new Government Department, including:

- *a new Department of itself will not address any ‘siloing’ that already occurs in fire management, and may lead to a worsening in this situation;*
- *there are high costs associated with establishing a new Department, and services (particularly corporate services) may be unnecessarily duplicated; and*
- *there will still be a need to address firefighting on the rural urban fringe which would not fit neatly within a separate new Department focussed on rural fire.*

The WAVFRSA submits that siloing is already an issue in some areas of firefighting response in WA. The creation of a fourth agency and bureaucracy responsible for the management of response and mitigation has the potential to further divide and isolate fire response and management. It is also important to recognise that the “third” agency is actually made up of some 120 LGs who all operate independently, with their own rules and processes for mitigation and response (albeit based in the Bush Fires Act 1954).

Members of the FRS (“rural urban fringe” in the report) operate in 88 rural locations across WA (with an additional four Career FRS stations within these locations); undertaking a number of operational roles outside of landscape/bushfires. During 2015/16 it is worth noting that members of the VFRS attended a total of 6,200+ incidents (of which 1,458 were landscape fires).

These include:

- Structure Fires – Retail, Industrial and Residential (including caravans, sheds etc)
- Other Fires (including cars, rubbish and other miscellaneous)
- Motor Vehicle Rescue (road crash rescue)
- HazMat situations (hazardous material incidents such as chemical spills, truck rollovers, gas leaks etc)
- Urban Rescue (including collapsed buildings, wells etc)
- Direct Brigade building fire alarms (DBAs)

In addition, our members also conduct visits to day-care centres, schools, aged care facilities and community events such as fetes, fairs and agricultural shows; where they undertake fire safety promotion, bush fire preparedness and other fire educational programs.

These operational responses and community engagement activities are the day to day “business as usual” component of our Service. This community focused approach will need to be taken into account when making any decision regarding the future structure and capability of the FRS.

It is difficult to comprehend what benefit the recommendation to create an RFS will be to the communities of Western Australia in these “business as usual” areas of response undertaken by the FRS. In fact, any reallocation of DFES funding to the proposed RFS (as suggested by The Bushfire Front Chairperson Roger Underwood) would ultimately result in a reduction of the FRS capabilities and be detrimental to community safety outcomes in the most populous areas of WA.

In addition to the landscape fires, which form the basis for this review, members of the VFRS were mobilised to “business as usual” areas of response during 2015/16. These included, but were not limited to:

- 1025 motor vehicle accidents/road crash rescues.
- 213 hazardous incidents.
- 605 structural fires.
- 691 other fires (rubbish, vehicle).
- 1272 false alarms / DBAs.

Page 249 of the report states *“on the evidence available (DFES Annual Reports) it appears that the number of structural fires is declining...”*

This statement is probably true in the metropolitan area; however it should be noted that the DFES Annual Report shows structure fires attended by all services and is not broken down on a service or location basis. Figures show that the number of structure fires attended by the VFRS in regional/rural areas has remained fairly consistent during the past five year period.

The Special Inquirer states on Page 257 that:

The creation of a service sitting wholly within the structure of DFES is also not recommended by the Special Inquiry. As outlined in this Chapter, DFES has not demonstrated a sufficient capability to manage rural fire, and as an agency adopts methodology and approaches which are unsuited to the rural fire context. It is also a unionised environment, and does not

sufficiently involve or utilise volunteer bush fire brigades, which are the backbone of rural fire management.

Response: Given the Special Inquirer spoke to only one member of the FRS that we have been able to identify, it is easy to see how he came to this conclusion. It is difficult, however, to understand how he could voice this opinion with any credibility, given the lack of consultation undertaken with volunteers outside of the BFS. As shown later in this document, our members attend a significant number of landscape/rural fires – often with our BFS counterparts – and yet their opinions and feedback was not sought.

Even more significantly, whilst the FES Commissioner was the HMA and therefore overall responsible for the incident once it was declared a Level 3 incident, the Waroona fire was clearly under the operational control of P&W. This is noted by the Special Inquirer on page 74 of his report.

It is also noted by this Association that Mr Ferguson undertook a review of the ability of P&W (then known as the Department of Environment and Conservation - DEC) to manage large scale fires following the Coroner's inquest into the Boorabbin fire fatalities in December 2007. This review, released in February 2010, concluded that "DEC has a sound capability and capacity for managing fire on its estate in Western Australia". It is the Association's belief that the conclusions drawn in this review could be seen to place the Special Inquirer in a conflict of interest regarding the latest MIR.

The WAVFRSA is also concerned that no mention has been made in the report of the consequences of delays in the escalation of some incidents to DFES control from local control (whether it be Local Government or P&W). These delays have, in a number of instances, negatively, and in some cases severely, impacted on the ability of DFES to quickly and effectively respond and bring the incident under control. As one VFRSA member eloquently stated, no Level 3 incident has been handed over to DFES that was well organised, under control and effectively resourced.

In fact, the Nous Group Report into the Lower Hotham and O'Sullivan Fires of January 2015 was critical of DFES in a number of areas, one of which was that they did not know the local environment. Unfortunately, the report also highlighted that the initial fire started on private property and was managed by local BFB crews; who failed to properly extinguish it. The fire then "took off" under adverse conditions a day or so later, after the BFB had left it unattended. This re-ignition then escalated to a catastrophic incident involving hundreds of firefighters and resulted in approximately 95,000 Ha of land being burnt out.

Whilst it is true that the Career FRS is indeed a "unionised environment", two thirds of the FRS in Western Australia is made up of volunteers represented by this Association. The overwhelming majority (88 out of 100 Brigades) are in rural communities across the State. Our members are intrinsically involved in the management of local landscape fires and in mitigation hazard reduction burns in their communities.

The Bush Fire Service is certainly an integral part of the firefighting, mitigation and response to bushfires in WA; however they are by no means the only service who undertakes these works or attends landscape fires in this State.

According to statistics, there were 4,485 incidents of landscape fires (this includes bushfires) during the 2015/16 financial year. Attendance at these incidents is broken down on a service level below:

Bush Fire Service	1,481
Career Fire and Rescue Service	2,388
Volunteer Fire and Emergency Service	254
Volunteer Fire and Rescue Service	1,216

** Note - some incidents will see turnouts of multiple Brigades to the same incident and so the numbers in the table above total more than the number of incidents **

The WAVFRSA believe the FRS has an important part to play in ensuring their regional communities manage the mitigation and response to landscape fire risks effectively, appropriately and in a timely manner.

Response to Other “Recommendations” from Ferguson Review – June 2016

Recommendation 1: *The State Government to explore options for streamlining the functions and the independence of the State Emergency Management Committee Secretariat and the Office of Bushfire Risk Management with a view to including an inspectorate function, and appointing a person who is dedicated to that role. The purpose is to provide assurance and reporting, and to inquire into, monitor and report transparently on emergency management standards, preparedness, capability, service delivery and investment performance outcomes.*

Within two years of the establishment of this arrangement the State Government to review and assess whether it is meeting the desired outcomes.

Response: The WAVFRSA is supportive of this recommendation and makes the following additional suggestions:

- Expand OBRM’s capability to also include being responsible for the approval of processes within services or local governments to ensure all processes for mitigation practices (either via hazard reduction burns, or other means) are consistent across all tenures.
- Possibility should be looked into for transferring SEMC Secretariat to the Department of the Premier and Cabinet to ensure suitable oversight is maintained.

Recommendation 2: *The Department of Parks and Wildlife to plan for the highest priority hazard reduction burning effort around settlements and critical assets in the South West and Perth Hills. The annual objective is to treat a total of 60,000 hectares of priority hazard reduction per annum, comprising 20,000 hectares per annum of Land Management Zone A and 40,000 hectares per year of Land Management Zone B.*

Response: The WAVFRSA is supportive of this recommendation and makes the following additional suggestion:

- P&W should, where possible, ensure local BFS and VFRS (where applicable) volunteers are involved in the planning and implementation of these hazard reduction burns to assist with improving interoperability. There will, however, be issues with the demands on already time poor volunteers.

Recommendation 3: *The Department of Parks and Wildlife to continue emphasis on landscape hazard reduction burning with the annual objective of treating 140,000 hectares per annum in Land Management Zone C. In combination with Recommendation 2 (above) the strategic objective will be that a fuel age of less than six years will be maintained across 45% of the landscape on State Forest, National Parks and other Parks and Wildlife managed lands in the South West and Perth Hills. This will address the current backlog (created from under achievements of the recent two decades of burn programs) by the end of the 2020-2021 burning season (i.e. within the next 5 years).*

Response: The WAVFRSA is supportive of this recommendation.

Recommendation 4: *The Departments of Parks and Wildlife and Fire and Emergency Services to develop options for the expansion of the 'Bushfire Mitigation Grant Scheme' utilising both State and Commonwealth Government funding to enable the implementation of hazard reduction works identified through the Bushfire Risk Management Planning process.*

This will target hazard reduction projects on land owned by private landholders in rural-urban interface areas, critical infrastructure protection, local government land, roadsides and land managed by utilities.

Response: The WAVFRSA is supportive of this recommendation.

Recommendation 5: *The Department of Fire and Emergency Services, utilising the Office of Bushfire Risk Management, to develop a simplified and fast track hazard reduction burn (and other fuel mitigation techniques) planning and approval process to ensure the timely conduct of township and asset protection burns by Bush Fire Brigades and individual property owners. The process is to be agile and adaptable for the range of stakeholders which may participate in low risk, small scale, low complexity burn planning and approvals.*

Response: The WAVFRSA is supportive of this recommendation; however, local Volunteer Fire and Rescue Service Brigades should also be involved in the process and implementation of hazard reduction burns within their local areas. This will improve interoperability at a local level.

Recommendation 6: *The State Emergency Management Committee to adopt, across all hazards, the doctrine of:*

- *the primacy of life;*
- *the 'Strategic Control Priorities' (as documented by the Department of Fire and Emergency Services); and*
- *community warnings that are timely, tailored and relevant.*

Agencies will reinforce amongst emergency management personnel the importance of this doctrine through briefings and intent statements.

Response: The WAVFRSA is supportive of this recommendation, particularly the point regarding community warnings that are timely, tailored and relevant. It is also imperative that those involved in the management of an incident (at all levels) is conversant with the "Strategic Control Priorities" to ensure everyone is operating on the same page.

Recommendation 7: *The State Government to establish an arrangement to develop a 'network' of Western Australian State Government agency personnel who can be called upon for bushfire and emergency incident management capability within Western Australia. The arrangement will be led by the State Emergency Management Committee and modelled on systems used by the Department of Parks and Wildlife.*

Response: The WAVFRSA is supportive of this recommendation, although it will require significant cooperation between State Government agencies and will need to be driven by DPC. It would also be beneficial to expand the roles of other agencies into incident management teams where specific skillsets are identified as being suitable and complimentary to the team.

Recommendation 8: *The Departments of Parks and Wildlife and Fire and Emergency Services to adopt the policy that all bushfire Level 3 Incident Management Teams in the Perth Hills and the South West will be integrated and pre-formed from the start of the 2016/17 fire season with substantial involvement of both the Departments of Parks and Wildlife and Fire and Emergency Services personnel on all teams.*

Response: The WAVFRSA is generally supportive of this recommendation; however there are a number of issues that would need to be worked through before they could effectively operate. We believe it would be of greater benefit to have regional teams as opposed to Hills/South West to ensure there are enough personnel available to manage multiple incidents at once.

Local volunteers also need to be placed in influential roles, whilst conversely local governments need to clearly identify and have commitment from their staff and volunteer members to fulfill these roles when required. It is no use having pre-formed, integrated incident management teams (utilising appropriate volunteers) if those volunteers are then unavailable – or choose to not participate in – these teams when an incident arises. This would then put further pressure on other agency personnel.

The commitment should also be tenure blind as some Regional Operations Advisory Committee members have indicated that a number of BFB members have expressed an unwillingness to participate in other jurisdictions IMTs.

Recommendation 9: *The State Emergency Management Committee, in consultation with Western Australian Farmers Federation, the Association of Bush Fire Brigades, the Contractors Association of WA, and the Forest Industries Federation of WA, to establish systems for the voluntary registration of:*

- *farmer firefighting units;*
- *contractor firefighting resources; and*
- *forestry industry brigades.*

The purpose of the arrangement is to facilitate the safe, efficient and effective recognition, organisation, deployment, management and coordination of farmer, contractor and forestry firefighter resources. The systems would include a process for enabling access through traffic management points during bushfires. Progress towards establishing these systems is to be reported by State Emergency Management Committee in its annual preparedness report.

Response: The WAVFRSA is generally supportive of this recommendation; however we also make the following comments:

- Registration should be compulsory and minimum standards of training, personal protective clothing and equipment met to ensure the safety of not only the individuals concerned, but of other firefighters.
- We note that Forest Industry Teams/Brigades are specialists in their field and should already have appropriate training, operational procedures, protective clothing and equipment in place.
- Contractor firefighting resources are draining local volunteer Brigades and require regulating to ensure they are meeting minimum training, protective clothing and equipment standards.

Recommendation 10: *The Departments of Fire and Emergency Services and Parks and Wildlife to investigate and adopt an emergency services resource management system that will enable the registration, tasking, tracking, management and coordination of emergency management personnel, vehicles, plant and aircraft.*

Response: The WAVFRSA is supportive of this recommendation; however we believe that SEMC should be empowered to take a more active role in directing agencies to use common platforms instead of each using different technologies. Common operating platforms would also increase interoperability and provide economies of scale for purchasing equipment, training packages etc. This should apply to all agencies involved in providing responses under a Level 3 incident, where possible.

Recommendation 11: *The Department of Fire and Emergency Services to investigate and adopt a system that will allow the public to opt in, monitor and receive, through a 'push mechanism', bushfire and other emergency warnings, maps and information using a wide variety of devices including personal hand held smart devices.*

Response: The WAVFRSA is supportive of this recommendation. The transfer to the national alert system instead of the "State Alert" previously utilised in WA has seen the loss of some functionality. The national body responsible for the future Emergency Alert enhancements should ensure a functionality gap analysis is completed and addressed in future releases. There should also be one 'app' used by all agencies involved in emergency services to make it easier for the general public to access timely and appropriate information.

Recommendation 12: *The Department of Fire and Emergency Services to work with the Department of Planning and Local Governments to adopt a policy which enables Local Governments to identify, register and communicate, 'Places of Bushfire Last Resort' in settlements and townsites where the life risk from bushfire is very high or greater.*

Response: The WAVFRSA is generally supportive of this recommendation, however there is no Australian Standard on their construction and this will be problematic. Additionally, the Emergency Management Victoria publication Bushfire Shelter Options Position Paper June 2015 highlights that Community Fire Refuges are least preferred and poses the higher risk. The position paper states 'It could be argued that the provision of community shelter options actually weakens community resilience by in effect creating a dependency upon local and state government to provide shelter options in high-risk communities'. An evidence based approach to developing a WA model should be explored.

Recommendation 13: *The Department of Fire and Emergency Services to issue a photo identification card to DFES members, members of Bush Fire Brigades, volunteer emergency services, Incident Management Teams, forestry industry brigade members and Networked Government Emergency Agency members. DFES also to consider temporary windscreen signage to identify vehicles carrying such personnel.*

Response: The WAVFRSA is fully supportive of this recommendation. This has been an ongoing discussion point for at least 15 years. A photo ID card was issued to VFRS Brigade members approximately five years ago, however the project stalled and should be re-energized and priority given to delivering a fit for purpose ID. A database should also be set up to assist in the management of cancelled cards etc.

Recommendation 14: *The State Emergency Management Committee to review the policy for traffic management at emergency incidents so it reflects national 'best practice'. This includes the production and issuing of an aide-memoire to guide traffic management, emergency and incident management personnel.*

The policy should provide a practical balance between risk to life and the public value of enabling the timely restoration of livelihoods and the movement of critical resources, (including essential services, critical businesses and livestock welfare services), through traffic management points.

The review will involve a range of stakeholders including the Departments of Fire and Emergency Services, Parks and Wildlife, Agriculture and Food WA; Main Roads WA, WA Police, WA Farmers Federation, WA Local Government Association, Forest Industries Federation, and the Transport Industry and ensure that the views of the community are considered.

Response: The WAVFRSA is fully supportive of a review being undertaken to ensure appropriate policies and guidelines are established. We note that discussions have been underway for some time, since the Keelty Report into Kelmscott/Roleystone in February 2011 and that SEMC released the "Traffic Management During Emergencies Guidelines" in May 2016.

The traffic management policy is outdated and should be replaced to reflect contemporary practices as outlined in the guidelines.

Recommendation 16: *The State Emergency Management Committee to establish a State Bushfire Coordinating Committee as a sub-committee of SEMC. The State Bushfire Coordinating Committee will be chaired by the Director of the Office of Bushfire Risk Management and will have the primary responsibility to:*

- *develop a State Bushfire Management Policy and a set of long term bushfire risk management objectives;*
- *provide a forum for key bushfire risk management stakeholder agencies;*
- *advise the SEMC on matters pertaining to bushfire, in particular, to report against the investment in, and achievement of the bushfire risk management objectives;*
- *provide advice and support to the proposed Chief Officer of the Rural Fire Service on bushfire risk management matters; and*
- *report to SEMC and to the community on bushfire risk management matters on at least an annual basis.*

Response: The WAVFRSA is generally supportive of this recommendation; however we note the following:

- mitigation practices are a time consuming and sometimes costly process that will need to be appropriately funded and legislatively supported;
- expansion of the capabilities of OBRM to ensure they have the capacity to undertake full and tenure blind audit processes of mitigation activities in the bushfire space is imperative to ensure an ongoing process and not just a reaction to a catastrophic incident.

Recommendation 17: *The Department of the Premier and Cabinet to conduct an independent review of the current arrangement for the management and distribution of the Emergency Services Levy. The review will have the specific purpose of:*

- *seeking input from key entities including the Departments of Treasury, Finance, Fire and Emergency Services, Lands, and Parks and Wildlife, WA Local Government Association, and the Office of Bushfire Risk Management.*
- *ensuring the arrangement has the flexibility and agility to deal with emerging bushfire risk priorities.*
- *establishing a budget process that enables a shift in investment towards prevention, mitigation and building community resilience and capability.*

Response: The WAVFRSA is not in favour of yet another review into the Emergency Services Levy. A full review was undertaken following the Keelty Review and is being continually raised by self-interested parties because they desire to influence funding outcomes.

It is recommended that the results and processes of the last review are released in an attempt to provide all stakeholders with better transparency and understanding why the model was retained.

“Opportunities” from Ferguson Review – June 2016

Comment has been made only where the Association has a strong view or the opportunity will directly impact on our members.

Opportunity 1: The Departments of Fire and Emergency Services and Parks and Wildlife (and, when established, the Rural Fire Service) to engage with the Bureau of Meteorology and the Bushfire and Natural Hazards Cooperative Research Centre to investigate the prediction of cloud to ground lightning occurrences.

Opportunity 2: The Departments of Fire and Emergency Services and Parks and Wildlife (and, when established, the Rural Fire Service) to engage with the Bureau of Meteorology and the Bushfire and Natural Hazards Cooperative Research Centre to investigate the causes of and effects of pyro-cumulus weather occurrences on bushfire behaviour.

Opportunity 3: The Department of Parks and Wildlife and the Forest Products Commission to explore policy options for mechanical thinning of forest, including mining rehabilitation forest, for the purpose of bushfire mitigation.

Opportunity 4: The Department of Fire and Emergency Services, in collaboration with the Departments of Planning, Parks and Wildlife, Environment Regulation and Water, to lead consideration of developing guidance to landholders with respect to bushfire ‘fuse breaks’ along lineal fuels such as roadsides and irrigation drainage channels.

Opportunity 5: The Departments of Fire and Emergency Services and Parks and Wildlife (and, when established, the Rural Fire Service) to investigate options for improving aerial and satellite based bushfire intelligence gathering. In particular, to investigate the provision of Infra-Red Linescan capability.

Opportunity 6: The Departments of Fire and Emergency Services and Parks and Wildlife, in conjunction with the Australasian Fire & Emergency Service Authorities Council, to explore the development of a standardised approach and content for an ‘initial (4 hour)’ Incident Action Plan.

WAVFRSA Commentary

The Association is strongly supportive of this opportunity, although we question the “initial 4 hour” component of the opportunity. It is our belief that incident controllers have enough to contend with during the initial escalation stages of an incident (such as setting up incident control / sector command points, communications, resourcing etc) without having to be fixed into a timeframe for providing information via a plan that was designed to provide information down the line – not up the line.

In the Executive Summary of his 2010 Review of DEC ability to manage major fires, Mr Ferguson states that “a summary Incident Action Plan could allow the Incident Controller to more quickly appreciate the situation and articulate a plan early in an incident”. In the Major Incident Review (MIR) into the Esperance District Fires undertaken by Nous Group in March 2016, a recommendation was made to “ensure IAP formats and processes are appropriate to the nature of the emergency response”. It was noted that “The current IAP format is geared towards informing multiple audiences...results in a lengthy document that is time consuming to produce and is not relevant...to responders on the fireground. IAP

formats and processes need to take into account the phase of the response, and must ensure fire responders receive appropriate information. During the escalation phase of a fire, there may be shorter, more focused IAPs that communicate the key safety and operational information needed by crews on the ground.”

The WAVFRSA supports the significant improvement work undertaken by DFES to restructure and streamline the Incident Action Plans and are generally supported by P&W.

Opportunity 7: The Departments of Fire and Emergency Services and Parks and Wildlife to assess the merits and disadvantages of Incident Controller and Incident Management Team work cycle extending over a 24 hour period (but still allowing for individual rest times in line with fatigue policy).

WAVFRSA Commentary

The Association believes that an assessment of this opportunity is important, however, we are cautious in respect to fatigue management, which we believe is currently not well managed. It is important for effective and efficient decision making at incidents that IC and IMT personnel are capable of making these decisions whilst managing fatigue appropriately. The WAVFRSA supports an IC appointment for a five (5) day duration with the Deputy IC (Level 3 qualified) covering nightshift periods. Where necessary, the IC can be woken during this period to make any critically important decisions.

Opportunity 8: The Department of Fire and Emergency Services to review the policy of dispatching task force resources from Perth metropolitan and regional urban locations to bushfires to ensure that only vehicles that are fit for purpose and appropriate to the task are deployed.

WAVFRSA Commentary

Whilst we are cautiously supportive of this opportunity, DFES is limited in the current makeup of its fleet; although this should be addressed with the “future fleet” program currently being undertaken.

Even then, however, there will always be instances where vehicles that are not “fit for purpose” will be mobilised to an incident due to the unavailability of other, more suitable vehicles. We firmly believe that a fire truck with appropriately trained firefighters is better than none at all. It is also important that members of each service are informed and educated on the limitations and functionality of vehicles that are not part of their own service. There will often be a requirement for rural urban interface firefighting that utilises vehicles that may not be intended to operate off road.

This opportunity should also consider the strategic location of appropriate vehicles in identified high risk areas across the State during high fire seasons.

Opportunity 9: The State Emergency Management Committee to develop policy guidance for local governments regarding the installation of bushfire and emergency community warning sirens in ‘at risk’ communities.

Opportunity 10: The Department of Fire and Emergency Services to lead, in collaboration with the Department of Planning and the Building Commission, the development of a policy and guidance to landholders on a range of bushfire shelter options, including household bushfire refuges and community bushfire refuges.

Opportunity 11: The Departments of Fire and Emergency Services, Planning, and Environment Regulation to consider policy options with respect to the clearing of vegetation by landholders within a specified distance of an asset or dwelling, for the purposes of bushfire protection.

WAVFRSA Commentary

The Association is strongly supportive of this opportunity and encourages the placement of legislative support via the new Emergency Services Act.

Opportunity 12: The Department of Fire and Emergency Services to engage with the WA Local Government Association to explore opportunities for Local Government personnel to be included in the make-up of Rapid Impact Assessment Teams.

WAVFRSA Commentary

The Association is strongly supportive of this opportunity and suggest that appropriately qualified VFRS members (i.e. those whose employment provides the necessary skillsets) could also assist within these teams.

Opportunity 13: The State Emergency Management Committee to develop an aide-memoire for Incident Controllers to guide the initial recovery considerations during an incident. The aide-memoire to include:

- triggers for the initiation of rapid impact assessment and the escalation of the recovery function; and
- immediate and likely future community health, welfare and safety considerations.

These triggers will inform the Incident Controllers when considering the discretionary appointment of 'Deputy Incident Controller, Recovery' during an incident that impacts on the community. The role of the 'Deputy Incident Controller, Recovery' would be (with the Incident Controller) to consider the initiation of the recovery process and to manage the transition from incident response to the recovery phase.

WAVFRSA Commentary

The recovery component of an incident is the responsibility of the Department of the Premier and Cabinet. Whilst the Association questions why the appointment of a Recovery Officer is discretionary, we believe there would be a great deal of benefit in having someone considering the recovery component of any major incident.

The WAVFRSA believe this position should be automatically triggered for all large incidents, although it may be better known as a 'Recovery' or 'Recovery Liaison Officer' through local government or an appropriate government agency, rather than through DFES or P&W.

Opportunity 14: The Department of Fire and Emergency Services training for Fire and Rescue career staff (at LFF and S/O training courses) to include enhanced training in natural hazard incident management; hazard reduction burning; rural and forest fire behaviour and the Department of Parks and Wildlife use of fire as a management tool.

Opportunity 15: The Departments of Fire and Emergency Services and Parks and Wildlife (and, when established, the Rural Fire Service) to agree on minimum targets for volunteer participation as Sector Commanders, and in Incident Management Team positions and develop strategies to meet those targets.

WAVFRSA Commentary

The Association has concerns with the establishment of “minimum targets” for volunteer participation in incident control positions. Whilst we support the provision of opportunities for volunteers to be trained in these types of roles, should they wish to do so, we do not believe a quota system will be effective.

This recommendation will improve the number of volunteers within the IMT. However, it will have consequential outcomes as highly experienced and qualified paid staff will be removed from IMT to reach the target quota. The WAVFRSA have always questioned the use of volunteers when there are enough paid staff to undertake the work; although we acknowledge that the extra numbers at large scale incidents is of benefit.

It should also be noted that there are a limited number of volunteers who have the necessary attributes or desire to undertake these roles. We also note that any volunteer who wishes to be trained as a Level 3 Incident Commander needs to be made fully aware of the legislative requirements this role has – and that the “volunteer” defence cannot be used in the event of a subsequent investigation etc.

It is also imperative that DFES and/or P&W maintains a database of all qualified volunteers who have a particular qualification required at an incident (similar to the list of Volunteer Liaison Officers currently held by DFES).

Opportunity 16: The Department of Fire and Emergency Services (and, when established, the Rural Fire Service) and the Volunteer Associations to develop fatigue management guidelines for emergency service volunteers.

WAVFRSA Commentary

Volunteer Associations were provided with the opportunity to be involved in a “Fatigue Management Advisory Committee” in 2014 (all Associations provided a representative). The policy has been in draft format for some time and is currently being discussed at the “implementation level”.

Opportunity 17: The Department of Fire and Emergency Services (and, when established, the Rural Fire Service) to measure and report annually on the volunteer fire and emergency service worker contribution.

Opportunity 18: The Department of Fire and Emergency Services (and, when established, the Rural Fire Service) in consultation with the Association of Bush Fire Brigade Volunteers, to review the policy for disposal of 'retired' firefighting vehicles to first make disposed vehicles available to landowners who are sponsored by the local Brigade. Such vehicles to be subject to a limited decommissioning process.

WAVFRSA Commentary

The Association questions why only the AVBFB is consulted on the decommissioning of firefighting appliances.

Opportunity 19: The Department of Parks and Wildlife, in consultation with their workforce and the Community and Public Sector Union (CPSU) and the Australian Workers Union (AWU), to carry out a workforce workload analysis of its fire program (covered by both the CPSU and the AWU workforce). The analysis to have a particular emphasis on the management of workload and fatigue in employees involved in the fire program.

Opportunity 20: The Department of Fire and Emergency Services to investigate, with the United Firefighters Union, an 'emergency roster' arrangement that enables the temporary adoption of extended firefighter shift arrangements to enable more career firefighters to be made available for duty during significant emergencies.

Opportunity 21: The Department of Fire and Emergency Services (and, when established, the Rural Fire Service) to implement (and act on) a volunteer emergency service worker consultation framework to promote effective and meaningful ongoing consultation with fire and emergency services volunteers on matters that affect volunteer systems of work, equipment and health, welfare and safety.

WAVFRSA Commentary

This opportunity appears at the bottom of the section titled "The Volunteer Voice" and the Association makes the following response:

On Page 250 of the report, paragraph 1 states that "volunteers in regional areas do not have any confidence in DFES administratively or operationally". This is a broad statement that disappoints the members of the VFRS. Only one member of the VFRS was consulted or interviewed with regards to this review. Further no members of the four VFRS crews on the ground in Yarloop on the 7 January 2016 were interviewed. Without this consultation, the Association is of the opinion that a balanced perspective of the Yarloop situation (specifically) is not possible.

The FRS have worked collectively and collaboratively utilising the "command and control" structure with the "trust and respect" principle espoused by the Association of Volunteer Bush Fire Brigades for many decades; and we are extremely disappointed that they continue to marginalise and denigrate our membership through comments in the media, social media and via submissions to these types of inquiries. Their constant call for "trust and respect" at the expense of "command and control" is operationally irresponsible and dangerous.

Opportunity 22: The Departments of Fire and Emergency Services and Parks and Wildlife (and, when established, the Rural Fire Service), in consultation with relevant stakeholders including the Public Sector Commission and the Volunteer Associations, to conduct (and act on) an annual culture survey amongst paid and career staff and volunteer emergency service workers.

Opportunity 23: When established, the Rural Fire Service, in conjunction with the Departments of Parks and Wildlife and Fire and Emergency Services, to establish a Western Australian Centre for Excellence in Rural and Forest Fire Management. The Centre to include a networked capability for research, planned burning, lessons learned and facilitating training for rural firefighters, especially for members of volunteer Brigades.

WAVFRSA Commentary

The Association is cautiously supportive of a centre that would be appropriately funded to research issues associated with bushfire mitigation and risk management activities. However, we strongly believe that all career staff and volunteer members who undertake operational firefighting roles should be receiving the same training across all services.

It is also important that the Office of Bushfire Risk Management be involved in the process undertaken to identify research opportunities.

We also believe that it is important for the Centre is linked to one of WA's Universities, much like the Bushfire Cooperative Research Centre in Victoria is connected to La Trobe University, Melbourne.