



Australian Energy Infrastructure Commissioner Community Engagement Review

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

October 2023

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1 Introduction

The Australasian Fire and Emergency Service Authorities Council (AFAC) welcomes the opportunity to make a submission to the *Australian Energy Infrastructure Commissioner (AEIC) Community Engagement Review*. The submission is based on consultation among AFAC membership as well as our broader understanding of the context of the consultation.

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

As part of this submission, numerous documents produced by AFAC have been cited. These documents form the foundation of information used for this submission and are referenced in the text with hyperlinks where possible. AFAC takes a leading stance in the publication of industry doctrine which has been drawn on where relevant. Doctrine ranges from high-level, principles-based capstone material, through to technical guidance. Individual agencies make practical and realistic operational decisions on how they interpret this doctrine.

This submission begins with an overview of AFAC and its role within Australasian fire and emergency services (**Section 2**). **Section 3** is a response to each of the questions provided by the *Australian Energy Infrastructure Commissioner Community Engagement Review*.

2 Overview of AFAC and its role

AFAC is the National Council for fire, land management and emergency service authorities in Australia and New Zealand. AFAC represents 33 members and 21 affiliate members comprising permanent and part-time personnel and volunteers, totalling approximately 288,000 firefighters and emergency workers. The list of AFAC member organisations is provided in Attachment 1.

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

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

AFAC's most significant intellectual property asset is a suite of doctrine publications which articulates good practice based on the knowledge and experience of our members and informed by research where it is available. It is evidence-based, constantly reviewed and vested as the official view by the AFAC National Council and sector leaders.

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

2.1 AFAC Strategic Directions

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

The Strategic Directions are:

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

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

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

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

2.3 AFAC supports the National Resource Sharing Centre

AFAC established the [National Resource Sharing Centre](#) (NRSC) to develop and maintain the national Arrangement for Interstate Assistance (AIA); pursue collaboration opportunities with international jurisdictions; maintain the National Statement of Capability for Fire and Emergency Services and provide support, if requested, to jurisdictions involved in deployments (<https://www.afac.com.au/initiative/nrsc/national-resource-sharing-centre-doctrine/national-resource-sharing-centre-fundamental-doctrine>). Its value has been clearly demonstrated in supporting the management of large-scale incidents by facilitating interstate and international deployments.

2.4 AFAC leads the Emergency Management Professionalisation Scheme

The Emergency Management Professionalisation Scheme (EMPS) exists to advance the cause of professionalisation in the practice of emergency management in Australia and New Zealand. Professionalisation is open to all emergency management personnel regardless of whether they are paid or volunteer, and regardless of the particular emergency management function they undertake.

EMPS provides an excellent example of a national approach for professionalisation in the industry.

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

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

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

2.6 AFAC and the National Aerial Firefighting Centre

AFAC provides aerial firefighting resources on behalf of the states and territories.

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

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

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

3 Comments on the Terms of Reference for the Community Engagement Review

AFAC has produced research and evidence-based considerations that are apolitical and are focussed on the safe implementation and uptake of alternative energy sources. This includes a guideline for emergency service organisations to consider when responding to emergency incidents involving wind farms and PV array systems, along with advocating for safer, more appropriate building standards particularly relating to car parks and charging infrastructure.

There are several AFAC collaboration groups that have an interest in the uptake of alternative energy. These include the Urban Operations Group, Rural and Land Management Group, SES Operations Group, Alternative and Renewable Energy Technologies Working Group, Community Safety Group, Built Environment and Planning Technical Group, Climate Change Group and the Fleet Technical Group.

There are questions posed in the Terms of Reference that are relevant to AFAC's role in advocating for public safety related to energy infrastructure.

3.1 Responses to specific questions:

1. In conducting the review, the AEIC should have regard to the following:

- a. Perceived or actual environmental impacts
- b. Perceived or actual impacts on agricultural land, including:
 - i. Emergency management, including fire and biosecurity risks

AFAC can assist with engagement towards addressing the recommendations below, along with the AEIC and any other relevant stakeholders through our [collaboration model](#), which encompasses 34 groups, technical groups and networks. This approach enables AFAC members to consider common challenges, generate solutions, develop positions and inspire new directions in practice.

All below information and recommendations are based on the 5 principles from [AFAC's Position on Bushfires and Community Safety \(2019\)](#).

The principles are as follows:

1. Human life should be valued above all else.
2. There should be a collaborative approach to the management of bushfire risk, with early community engagement, and with all partners working together to take action to protect communities and save people's lives.
3. Community awareness and education programs and resources should recognise that prepared and knowledgeable communities are more resilient to the impact of bushfire.
4. Emergency management leaders should have the capacity and capability to provide quality leadership and expert guidance to the community during a bushfire.
5. Community resilience is increased through effective land-use planning and building controls, supported by legislation, policy, guidance material and advice.

AFAC recommends that the relevant fire, land management and emergency management agencies for the areas of installation are engaged with and consulted in the planning and implementation of all significant energy infrastructure installations, including wind farms, solar farms, high voltage transmission lines and battery energy storage systems. This recommendation complies directly with principles 2 and 5 of the AFAC Position on Bushfire and Community Safety (2019) referenced above, and is also consistent with Recommendation 8 of the [Building Ministers Building Confidence Report, Australian Government Department of Industry, Science and Resources \(2018\)](#), (commonly referred to as the Shergold Weir Report), which states:

“Recommendation 8: That, consistent with the International Fire Engineering Guidelines, each jurisdiction requires developers, architects, builders, engineers and building surveyors to engage with fire authorities as part of the design process.”

Incidents such as the Victorian Big Battery fire in July 2021 and the recent Bouldercombe Battery Project fire in September 2023 are acknowledged as rare events, however they demonstrate the importance of consultation and collaboration with fire and emergency services at the planning and design stages. AFAC member agencies may be required to dedicate significant resources and sustain risk exposure to attend and contain incidents to protect life, property, and the environment.

Where it can be demonstrated that fire and emergency services have been consulted on the design and planning and are informed and aware of the potential risk consequence, communities may have greater confidence in any potential required emergency response. Fire and emergency service consultation and endorsement may also lead to the following outcomes:

- Reduction of opposition relating to safety concerns.
- Increased confidence in the installed safety measures and planning.
- Increased protection of environment through effective and efficient containment of any failure incidents.
- Streamlined implementation of site developments.

AFAC recommends that where installations are on public land, the relevant land management authority is engaged with. Any increase in requirement for asset protection and risk mitigation activity, including planned burning resulting from the installation of infrastructure, should be subsidised appropriately.

As per the AFAC Position on Wind Farms and Bushfire Operations ([AFAC, 2019](#)), fire and land management agencies may consider developing guidelines that outline preferred preventative safety measures for facilities in a manner that is targeted to local legislation and planning regulations. In the period after an emergency event, infrastructure operators should be actively involved in recovery activities. This may include supporting and communicating with emergency-affected communities and helping to coordinate the reconstruction of infrastructure as required.

In general, AFAC is supportive of implementing the below fire risk management principles ([CFA, 2023](#)) when planning for installations of all energy infrastructure:

1. Effective identification and management of hazards and risks specific to the landscape, infrastructure, layout, and operations at the facility.
2. Siting of renewable energy infrastructure so as to eliminate or reduce hazards to emergency responders.
3. Safe access for emergency responders in and around the facility, including to renewable energy and firefighting infrastructure.
4. Provision of adequate fire-fighting infrastructure for safe and effective emergency response.
5. Vegetation sited and managed so as to avoid increased bushfire and grassfire risk.
6. Prevention of fire ignition on-site and spreading to adjoining properties.
7. Prevention of fire spread between site infrastructure (solar panel banks, wind turbines, battery containers/enclosures).
8. Prevention of external fire impacting and igniting site infrastructure.
9. Provision of accurate and current information for emergency responders during emergencies.
10. Effective emergency planning and management, specific to the site, infrastructure, operations and hazards (including bushfire).

AFAC has published several guidelines and position statements on Li-ion batteries and alternative energy-related matters, including:

- [Incidents involving PV array and battery energy storage systems](#)
- [Incidents involving Electric Vehicles](#)
- [Electric Vehicles \(EV\) and EV charging equipment in the built environment](#)

AFAC members have also published more detailed guidance for infrastructure installations:

- [CFA's Design Guidelines and Model Requirements for Renewable Energy Facilities v4 \(2023\)](#)
- [South Australia Metropolitan Fire Service Position Statement – Battery Energy Storage Systems](#)
- [Fire and Rescue NSW' Technical Information Sheet – Large-scale external lithium-ion battery energy storage systems – Fire safety study considerations](#)

AFAC recognises and supports Australia's transition to sustainable forms of energy. AFAC also implores policy makers to ensure appropriate safety measures are developed, maintained and regulated to reduce the risk to communities and first responders.

APPENDIX 1: AFAC MEMBER ORGANISATIONS

Full Members (33)

Australian Capital Territory

ACT Emergency Services Agency
ACT Parks and Conservation Service

New South Wales

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

New Zealand

Fire and Emergency New Zealand

Northern Territory

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

Queensland

Queensland Parks and Wildlife Service
Queensland Fire and Emergency Services

South Australia

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

Tasmania

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

Victoria

Country Fire Authority
Forest Fire Management, Department of Energy, Environment and Climate Action
Fire Rescue Victoria
Parks Victoria
Victoria State Emergency Service

Western Australia

Department of Fire and Emergency Services

Department of Biodiversity Conservation and Attractions, Parks and Wildlife Service

National

Air Services Australia

Department of Home Affairs, National Emergency Management Agency

Parks Australia

Affiliate members (21)

Ambulance Tasmania

Australasian Road Rescue Organisation

Australian Maritime Safety Authority

Australian Red Cross

Brisbane City Council

Bureau of Meteorology

Council of Australian Volunteer Fire Associations

Department of Conservation Te Papa Atawhai New Zealand

Emergency Management Victoria

Geoscience Australia

Hong Kong Fire Services Department

HQPlantations Pty Ltd

Melbourne Water

Ministry of Civil Defence and Emergency Management

National Biosecurity Response Team

National SES Volunteers Association

NSW Department of Primary Industries

NSW Environment Protection Authority

Pacific Islands Fire & Emergency Services Association

Surf Life Saving Australia

VRA Rescue NSW