



DISCUSSION PAPER

May 2017

REGISTRATION OF FARMER FIREFIGHTING UNITS

1. Background

The *Report of the Special Inquiry into the January 2016 Waroona Fire* (Ferguson Report) by Euan Ferguson AFSM contains seventeen 'recommendations for strategic change' and identifies a further twenty-three 'agency opportunities for improvement'.

On 29 September 2016, the Western Australian (WA) Government announced that it supported all seventeen recommendations including:

Recommendation 9:

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 units;*
- *forestry industry brigades*

The purpose of the arrangement is to facilitate the safe, efficient and effective recognition, organisation, development, 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.

Individuals have always been able to fight fires on their own land and it has been the custom and practice that community members (especially the farming community) attend fires using their own equipment to protect their property and that of others¹. There are a number of locations within WA where local firefighting brigades work with both farmers and other contractors to protect their community. These arrangements work well for low intensity or short duration fires (level 1). As fires escalate however, there is a need to bring in additional firefighting and mitigation resources and equipment including incident management teams (IMT's).

Evidence provided at the Special Inquiry indicated that, while there are large numbers of farmers', forestry and private contractors' vehicles and equipment available to support firefighting efforts private firefighting equipment during large scale incidents, this is managed in an ad-hoc manner. The Special Inquiry received a number of submissions that stated that private resources were available, and not used, during the Waroona Fire².

¹ Bushfire Act 1954 Section 28 Occupier of Land to Extinguish Bush Fire Occurring on Own Land

² Report of the Special Inquiry into the January 2016 Waroona Fire (P.146)

Recommendation 9 seeks to address this issue by developing a voluntary registration system for farmer firefighting units, contractor firefighting resources and forestry industry brigades.

1.1 Other Recommendations Affecting Ferguson Recommendation 9

There are a number of recommendations listed in the Ferguson report that relate to Recommendation 9. These are:

Recommendation 10

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

This recommendation is linked to recommendation 9 in that any resources identified through the recommendation 9 policies and process would be entered into the recommendation 10 resource management system to fulfil the organisation, deployment, management, and coordination component of recommendation 9.

Recommendation 13:

The Department of Fire and Emergency Services (DFES) 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.

Systems identified during the work on Recommendation 9 may need to incorporate the formal identification cards produced through Recommendation 13. This would enable a better form of identification for Control Point Operators and enabling greater access to incidents and or Control and Staging points.

Recommendation 14:

The State Emergency Management Committee (SEMC) 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.

Vehicle Identification Stickers developed through the work on Recommendation 9 will need to be incorporated in the processes developed for Recommendation 14. This will enhance community understanding of the management of incidents and enhance the education of vehicle control points.

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.*

Policy developed to address Recommendation 9 will be considered and approved by the State Bushfire Coordinating Committee.

2. Scope

This paper explores options to facilitate the safe, efficient and effective recognition, organisation, development and coordination of farmer firefighting resources.

Private contractors and forestry industries are not specifically considered in this paper as the forestry industries in particular currently have in place some processes and procedures that promote more efficient and effective use of private resources, including equipment standards. There are however, opportunities to improve and expand these systems, and to address issues regarding their use that were raised in the Ferguson Report. This will be considered in a separate forum.

3. Current Legislation and Policy Framework

There are a number of documents which guide policies and practices around firefighting units in WA. These are:

- *Bush Fires Act 1954;*
- *Emergency Management Act 2005;*
- Department of Fire & Emergency Services (DFES) Guidelines for Operating Private Equipment at Fires (Third Edition 2011); and
- State Emergency Management – Traffic Management during Emergencies Guideline 2015.

4. Acronyms

CASA	Civil Aviation Safety Authority	MOU	Memorandums of Understandings
CFA	Country Fire Authority	OBRM	Office of Bushfire Risk Management
DFES	Department for Fire & Emergency Services	OEM	Office of Emergency Management
DPaW	Department for Parks and Wildlife	PPE	Personal Protective Equipment
FIRWA	Forest Industries Federation WA	SAP	Standard Administration Procedure
IC	Incident Controller	SEMC	State Emergency Management Committee
IMT	Incident Management Team	SOP	Standard Operational Procedure
LG	Local Government	VIS	Vehicle Identification Sticker

5. Current Situation

It is recognised that in various parts of WA, farmer and other private firefighting units, contractor firefighting resources and forestry industry brigades are an essential part of the response to fires in the community. Emergency service responders are committed to working with all operators to:

- promote the safe, efficient, effective and cooperative use of firefighting resources to control a fire in the shortest possible time; and
- provide operators with information to enable them to make informed decisions regarding their actions and use of resources.

It is expected that all firefighting operators are aware of their capabilities and that of their equipment, ensuring that any tasks or actions undertaken are appropriate and safe. There is also an expectation that all operators accept responsibility and are accountable for their actions at fire incidents.

There are currently a number of systems, structures and agreements in place, including Panel Contracts, Agreements, Memorandums of Understandings (MOU), Directives, Standard Operating Procedure (SOP) and Guidelines that contribute to the acquisition of resources during emergency response.

DFES has also introduced a vehicle identification system to provide timely identification of private vehicles and persons suitable for access to an incident (under the authority of the Incident Controller). These identification stickers (See Figure 1) are fixed to the vehicle and authorised by local government. Details regarding identification stickers are available in Section 6.



Figure 1(Example Only)

Additionally, emergency control agencies have separate policies, processes and procedures for the engagement of resources during incidents.

6. Farmer Firefighting

The safe, efficient and effective recognition, organisation, deployment, and coordination of farmer firefighter resources present different challenges than that of managing contractors or forestry industry resources. Farmer firefighting units, unlike for example plantation forestry units, are usually individually owned, and operate largely outside the scope of influence of fire agencies in terms of setting minimum standards for equipment, training and operations.

The DFES Guidelines for Operating Private Equipment at Fires (Third Edition 2011) is an information booklet aimed at detailing safe, efficient and effective practices. These practices are supported by internal procedures including Directive 3.2 – Incident Control, Standard Operating Procedures SOP 3.3.2 – Road Hazard Management, and Standard Administrative Procedure; 3.3.C – Vehicle Identifiers & SAP 3.2.D – Restricted Access Permits to give vehicle identifier stickers (figure 1) to members of the

public to identify them as persons who are authorised by local government to assist with operations. The identifiers system recognises that response is often supplemented by farmer firefighting resources (private vehicles, machinery and support vehicles) and in order to provide timely access to incident grounds an identifier sticker can be used to provide access through road blocks (provided this is approved by the Incident Controller).

This is a voluntary system which operates via the local government processes. The local government is responsible for issuing and maintaining a register of people and vehicles that have been issued with identifier stickers. As outlined in SAP 3.3.C- Vehicle Identifiers, a number of minimal conditions are recommended for operating private equipment at fires before stickers are issued. Local government is also encouraged to place additional conditions if required. For example,

- The fire response vehicle Identifier is for the purpose of fire response.
- Appropriate personal protective equipment and clothing will be worn at all times.
- The operator has received a copy of the “Operating Private Equipment at Bushfires” and will make drives of the vehicle familiar with the document.

The stickers may be issued not just to farmer firefighting vehicles but to any vehicle providing assistance or support. Local Governments are not required to inspect vehicles and or monitor the fitness of operators as the primary purpose is to enable identification and transit through traffic managed areas under the authority of the Incident Controller. Since the inception of the vehicle identifiers system there has been varying degree of uptake by local governments.

Information provided to DFES by the City of Busselton covering the period October 2016 to February 2017 indicates that the uptake of the Vehicle Identification Stickers (VIS) program has been sporadic. Uptake has mainly been local volunteer fire brigade members while the main target audience is farmers. Since the inception of the scheme, the City of Busselton has not had a major incident that required the use of vehicle control points, and as such, has not been able to provide data on the effectiveness of the VIS program in that context. The City of Busselton report also indicated that an enhanced education program would be required for the program to be more effective.³

6.1 Farmer Firefighting Unit Benefits & Opportunities

There are a number of benefits and opportunities in using and encouraging the use of farmer firefighting resources. These include but not limited to;

- Improved utilisation of local knowledge, that enhances identification of access routes to incidents or best locations to attack the fire;
- Good understanding of local emergency management arrangements;
- Fast response times;
- Potential greater pool of firefighting resources for consideration by the Incident Management Team;
- Opportunity to complement and or enhance strike teams; and
- Potential cost reduction associated with response.

³ Report compiled by Tim Wall A/Area Officer Albany West Operations Great Southern Region

6.2 Disadvantages of Farmer Firefighting Units

There are also disadvantages and or challenges to using farm firefighting units where there is no affiliation with volunteer bushfire brigades including but not limited to:

- Difficulty in the management and quality control of safety standards for vehicles, including; a lack of uniform safety features (fire appliance curtains, deluge systems, Personal Protective Equipment).
- Limited or no communications within the vehicles
- Inability to track firefighting resources
- No method to register competencies, experience or fitness of vehicle operators
- Limited integration into existing emergency services management structures
- Culture issues with other trained emergency personal (Volunteers & Career)
- Logistics of moving large farming machines across roadways etc.
- Insurance costs (who will pay if something breaks)

6.3 Legislation

The use of farmer firefighting resources is provided for under section 35A of the *Bush Fires Act 1954*, in so far as a person operating under the direction of a bushfire control officer is also defined as a volunteer firefighter.

Volunteer fire fighter means a bushfire control officer, a person who is a registered member of a bushfire brigade established under this Act or a person working under the direction of that officer or member (Section 35A inserted by No.60 of 1992s. 18; amended by No. 14 of 1996s. 4.)

This gives rise to insurance provisions for volunteer fire fighters within the *Bush Fires Act 1954*.

Section 37. Local government to insure certain persons

- (1) *A local government that maintains a bush fire brigade shall obtain and keep current—*
- a policy of insurance that insures volunteer fire fighters for compensation, payable in accordance with subsection (2) for injury caused to them while they are engaged under this Act in normal brigade activities; and*
 - a policy of insurance that, subject to subsection (10), insures against loss or damage all appliances, equipment, and apparatus of the bush fire brigade and any privately owned appliance, equipment, or apparatus that is used under the direction of a bush fire control officer, or an officer or a member of a bush fire brigade for the purposes of this Act.*

Therefore persons operating farm firefighting equipment are able to be integrated within the incident management structure and is covered by insurance, provided they are working at the direction of a bushfire control officer.

Note: In order to access these protections, under 'duty of care' provisions, there may be a requirement for local government to ensure private equipment and appliances are safe and meet standards for firefighting equipment.

7 Discussion

Evidence provided to the Special Inquiry highlighted that discouraging the use of private units on fire grounds is disempowering and contrary to the goal of building community resilience.⁴ A number of submissions received indicated that the South Australian Country Fire Service currently has a program in place that provides processes and protocol to register farmer firefighting units. Mr Ferguson in his report concluded that these concerns could be addressed through the implementation of a system which allows for the registration of private resources. The following section examines the South Australian Country Fire Service model, as a potential model for WA.

7.1 South Australian Model

In examining the South Australian Model, systems used in Victoria and New South Wales were also considered, given they are very similar. The South Australian system allows for the firefighting units to be registered after they meet a number of conditions and or criteria. Compliance registration occurs, and is sponsored at a local level, through the involvement of local volunteer bushfire brigades via equipment muster days, agricultural shows and farm visits. Firefighting equipment, including vehicles, trailers, slip-ons units and personal protective clothing is inspected to ensure that:

- the equipment is suitable and capable of performing the task
- equipment is reliable and
- equipment has the capability and robustness to operate in a hostile environment.

Equipment used during firefighting operations is not exempt from legal requirements and operators must comply with legal obligations including traffic regulations and code. Equipment engaged in firefighting operations must meet the following minimum requirements:

- Equipment/vehicles must not be overloaded (i.e. the gross vehicle mass must not be exceeded). This is a critical safety issue as an overloaded vehicle will be less stable, be harder to steer and have reduced braking capacity.
- Any load, including tanks, pumps, hose reels and fittings must be secured.
- Water tanks are to be fitted with baffles to reduce the movement of water inside tanks, improving stability.
- All vehicles including trailers must be registered and roadworthy, as they may be used on public roadways when participating in firefighting operations.
- Firefighting equipment including pumps, tanks, hose reels and fittings must be mechanically sound and in good working order.
- Vehicles should have a first aid kit and burn over blanket for personal protection.
- Vehicles should be equipped with an amber rotating beacon to enable operators to “*see and be seen*”).
- If personnel are operating from a tray they must have rails to ensure safety of operators.
- Vehicles/equipment must have an adequate communications system.

The farmer firefighting programs in the eastern states also consider Personal Protective Equipment (PPE) requirements; however the requirements are not explicitly documented. The need for PPE is expanded in the next section.

⁴ Report of the Special Inquiry into the January 2016 Waroona Fire (P.150)

7.2 Potential Western Australian Model

The proposed South Australian model discussed above could be used as a basis for a WA model. In addition, the WA model would expand on PPE and Occupational Health and Safety considerations.

It is recognised that the use of protective clothing is an imperative requirement, and any person involved in firefighting operations must ensure they wear clothing which will protect them while working in hostile and hazardous environments. As a minimum all persons involved in firefighting operations should be suitably equipped and dressed, this includes:

- Cotton or natural fibre overalls with long sleeves or cotton or natural fibre long sleeve work shirt and trousers;
- Sturdy leather gloves;
- Safety Helmet with chin strap;
- Safety goggles;
- Dust mask and hearing protection (may be required for some tasks);
- Safety boots (leather); and
- High visibility vest (particularly for working on road ways).

Equally, it is acknowledged that responding to emergencies can be potentially dangerous and traumatic. All fire defence activities involve a number of physical and environmental risks to responders. Active fire defence tasks are often long in duration, physically demanding, psychologically stressful and can expose the responder to extreme environmental conditions. Individuals who do not effectively manage their own health and fitness significantly increase their risk of developing injury, illness or succumbing to the effects of fatigue. The physical characteristics required of an individual performing firefighting duties should include a moderate level of aerobic capacity (ability to perform long duration work to exhaustion), sound musculoskeletal function of the upper and lower extremities (the ability to lift safely from below the knees, to shoulder height and above the head) and strong load carriage abilities (being able to transfer an object of substantial weight from one position to another).⁵

In addition, individuals performing active firefighting duties should not have any significant medical conditions which could impact on their ability to safely perform the tasks required. Appropriate physical preparedness in respect to hydration, nutrition and sleep hygiene are also critical factors which impact on health, safety and performance of fire responders (although it is understood these factors cannot always be proactively addressed prior to an incident).⁶

The responsibility for safety during firefighting operations is vested with individuals and as such any persons operating a firefighting unit on a fire ground are required to undertake safety and operational training. The training is designed to minimise the inherent risks associated with operational firefighting and promote safe work practices. It is usual for the training program to include;

- Safety Procedures;
- Basic Fire Suppression Training;
- Log On Log Off Procedures; and
- Command, Control & Communication Procedures.

For the WA model, it is envisaged that once firefighting units meet compliance, and operators have undertaken basic training (similar to the program operating in South Australia Country Fire Authority) the units would be issued with a registration sticker (Figure 2) that would then be displayed on the firefighting unit enabling them to assist in operational firefighting.

⁵ DFES Physical Wellness Coordinator Mitchell Sewell (BExSpSc, BExRehab & GCBus) Accredited Exercise Physiologist

⁶ DFES Physical Wellness Coordinator Mitchell Sewell (BExSpSc, BExRehab & GCBus) Accredited Exercise Physiologist

Details of the registration would then be forwarded to the DFES or the Department of Parks and Wildlife Regional Office and placed on a resource log for use during large incidents (as required).



Figure 2(Example Only)

It is acknowledged that this type of program would require further education and resources to undertake its development and implementation. The benefits of this program would however, ensure that farmer firefighting units and the person operating these units function in accordance with key principles with safety as the number one priority and those operators accept responsibility and are accountable for their actions at fires.

The program would promote:

- the safe, efficient and cooperative involvement of independent firefighting units to control a fire in the shortest possible time;
- the provision of information to these independent firefighting units so they can make informed decisions about their actions/tasks;
- the monitoring and tracking of crews and equipment during incidents;
- the independence and appropriateness of firefighting skills and knowledge;
- the provision of suitable personal protective clothing;
- working cooperatively with emergency services and others;
- a cohesive response environment; and
- better communication with Incident Controllers, firefighters, Police etc.

Successful firefighting depends on all personnel working cooperatively. Emergency Services operate under pre-determined procedures and protocols with well-established action plans which define the tasks to be undertaken. The inclusion of farmer firefighting resources within these pre-existing systems will ensure improved coordination of resources to deliver a safer, effective and efficient response to fire incidents.

8. Proposed Options

In response to Ferguson Recommendation 9, there are three options for consideration by WA stakeholders.

- Option 1 – Increasing the understanding of existing processes
- Option 2 – Improving current processes and practices.
- Option 3 – Pre-registration of farmer firefighting equipment.

A summary of the advantages and disadvantages of each option is provided in [Attachment 1](#).

8.1 Option 1- Increasing the understanding of existing processes

This option involves the retention of existing process for the use of farmers, contractors, forestry workers including tenders and agency operational arrangements. However, agency understanding of

the current process of engaging non-contract resources in an emergency response would be required. The implementation of this option would include the development of education strategies, programs and activities to promote community learning and understanding of existing processes and procedures. This will ensure the development of the capacity of individuals, groups and incident management teams to improve the understanding of resources currently vested in the community.

8.2 Option 2 – Improving Current Processes and Practices

This option involves local governments undertaking a more detailed recording of resources within their Local Emergency Management Arrangements (LEMA), which would be informed by way of a standing agenda item at the Local Emergency Management Committee meetings. Information would include the location of firefighting equipment, operators and the number of vehicles registered via the 'vehicle sticker' system. Subsequently, the local resource register could be linked to the broader resource management database being developed under Ferguson Recommendation 10.

8.3 Option 3 – Pre-registration of Farmer Firefighting Equipment

This option proposes the development of a process and guideline similar to the South Australia and Victorian models, where farmers voluntarily pre-register their firefighting equipment with the local bush fire brigade, for use during large scale fires. This is undertaken using a method whereby farmers and their equipment meet a number of conditions/criteria including the need to undertake basic training. These units are then provided with a registration sticker similar to the one in Figure 2, which is placed on the vehicle indicating that they have met all requirements.

That way, when these registered resources are required during an incident, they attend the control point and log on. The units will then be integrated into the response arrangements through the provision of a briefing to ensure they understand the safety requirements, and then tasked and possibly linked up with fire crews (via strike team, supporting a crew and or shadowing).

It should be noted that the coordination of such a program would require the identification of a host agency, and implementation and maintenance of such a model would require resources and an education program. The education program would support staff, volunteers and community participants by providing them with the latest information on techniques, processes and procedures providing them with the tools and strategies to combat fires within the community and to promote best possible practice and safe working standards. This proposed model should reduce liability and ensure quality as a foundation to improve and strengthen practice and collaboration in the response to fires. The model is also designed to be transferable, and support the new structures and legislative change that are anticipated in the near future.

9 Conclusion

Based on evidence from the Ferguson Report, there is a need to ensure Incident Management Teams are aware of and engage appropriate firefighting resources within the vicinity of incidents that may impact on the community. This view was supported by the following submissions to the Special Inquiry:

The WA Farmers Federation put the following to the Special Inquiry:

WA Farmers Federation proposed that a register of people be kept with certified firefighting units: This will allow the Incident Control Manager to see what local assets are available in the immediate area. The benefit of this is that the fire front will be able to be extinguished

from a far greater range of target points, leading to the containment of the fire in a shorter time frame.

As noted by the WA Forest Industries Federation:

The State would benefit from the better coordination of both State and private resources in the response to a fire threatening private property, plantation assets and State managed land.

For all options, there is an opportunity to engage with stakeholders including WA Farmers Federation, Associations of Volunteer Bush Fire Brigades, Contractors Association of WA and the Forest Industries Federation of WA to create awareness and encourage uptake of any program that is developed.

It is clear from information and evidence that has been provided from the WA Farmers Federation, the Association of Bush Fire Brigades, the Contractors Association of WA and the Forest Industries Federation of WA that a program similar to the ones currently in the Eastern State, i.e. option 3, is the preferred strategy. As mentioned, this strategy would require careful consideration due to the resources required to develop and maintain such a system, including the purchase and provision of appropriate PPE. Additionally, an appropriate 'host agency' would need to be identified to coordinate and maintain such a system.

Stakeholders are encouraged to provide comment on all three proposed options. Commentary can be provided by email to policy@oem.wa.gov.au.



OPTION SUMMARY

OPTION	ADVANTAGES	DISADVANTAGES	OTHER RECOMMENDATIONS ADDRESSED
<p>Option 1 Increasing the understanding of existing processes.</p>	<ul style="list-style-type: none"> • Enhanced agency understanding of non-contract resources. • Possible increase of resources pool. • Enhanced understanding of existing processes and procedures by community. • Potential pool of resources able to be used by Incident Management. • Opportunities for increased community engagement and key stakeholders. • A number of administrative systems are already in place. 	<ul style="list-style-type: none"> • Possible limited up take due to harvesting, and other farming works. • Limited resource development. • Limited or no safety standards. • Reduced processes for determining fit for purpose. • Resources may not be available during times of need if approached in an ad-hoc manner. • Potential for double dipping (via invoices) • Unknown condition and capability of community resources. 	
<p>Option 2 Improving current processes and practices.</p>	<ul style="list-style-type: none"> • LEMC's have an understanding of equipment & resources within their community. • Enhanced understanding of community capacity. • Templates already developed. • Meetings already scheduled and operational 	<ul style="list-style-type: none"> • Resource intensive for LEMC's. • LEMA resource list may become too large. • Limited understanding of resources (Type, use, transportation etc.). • No processes for determining fit for purpose 	<p>Recommendation 10 Recommendation 13</p>
<p>Option 3 Pre-registration of farmer firefighting equipment.</p>	<ul style="list-style-type: none"> • Meets the needs of Recommendation 9 of the Ferguson Inquiry. • Current stakeholders preferred program. (Farmers' Federation, Forestry Industries, Bushfire Brigade Association etc.). • Meeting of Safety Standards. • Operators understanding of command structures and fire prevention strategies. • Equipment used is fit for purpose. • Operators will be provided with appropriate training and Personal Protective Clothing. • Incident Controllers and IMT's have up to date records of community resources & equipment. • Tracking of resources during incidents. • Opportunities for community engagement and key stakeholders 	<ul style="list-style-type: none"> • Program requires resources and support from management. • Education program required to be developed. • Sponsorship may be required from fire services 	<p>Recommendation 9 Recommendation 10 Recommendation 13 Recommendation 14</p>