Friday, 6 June 2025

National Competition Analysis 2025
Productivity Commission
Locked Bag 2, Collins St
East Melbourne VIC 8003

Dear Sir / Madam

Re: National Competition Policy analysis 2025 - Call for submissions

I'm writing to provide a submission to the National Competition Policy analysis 2025. I start by providing background on AFAC, our role in the development and maintenance of Australian Standards, and provide insights regarding matters important to the protection of lives and livelihoods in Australia.

In summary, AFAC feels the blanket adoption of international standards without contextual operational, geographic or environmental consideration could increase the danger to our communities and first responders.

About AFAC

AFAC is the National Council for fire, land management and emergency service authorities in Australia and New Zealand. AFAC represents 35 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 Appendix 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 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:

- management of fire related risks
- fire protection and fire safety
- firefighters PPE

- fire protection systems and equipment
- fire safety systems and equipment, and
- storage, transportation and handling of dangerous goods/hazardous materials.

AFAC Australian Standards Representation
Currently to develop an Australian Standard, Standards Australia bring together representatives from business, industry, government and community groups to form Technical Committees. The creation of these Technical Committees subsequently ensures that the voices of all stakeholders in any particular area may be heard.

AFAC currently have representation on over 70 Australian Standard technical (and sub) committees, playing a key role in the development and revision of Australian and International Standards, which advance and guide the interests of the broader emergency management sector. AFAC's representation on these committees allows AFAC significant voice to drive progress and raise concerns identified during any of the four phases of emergency management, these being, Prevention, Mitigation, Preparedness & Response, and Recovery at a national level. These concerns when raised in technical committees, can then lead to changes that significantly enhance firefighter, emergency service personnel, and community safety.

Considerations regarding impact to emergency services and consequently public safety

Australian Standards v International Standards
An analysis of the use of international standards in the Australian context provides insight to potential challenges.

Tunnel Fire Safety
Table 1 provides a simple comparative assessment of the fixed water-based firefighting systems required by the Australian Standard AS 4825—2011 *Tunnel Fire Safety* and the American Standard NFPA 502—2023 *Standard for Road Tunnels, Bridges, and Other Limited Access Highways.*

Table 1: Comparison of international and Australian Standards for selected built environment matters.

Item	AS 4825—2011	NFPA 502
Road tunnel classification	Clause 1.4. Long tunnel (L) where the length is greater than 120 m. Short tunnel (S) where the length is less than the long tunnel.	Clause 7.1 Category X — Where tunnel length is less than 90 m (300 ft). Category A — Where tunnel length is 90 m (300 ft) or greater. Category B — Where the tunnel length equals or exceeds 300 m (1000 ft). Category C — Where the tunnel length equals or exceeds 1000 m (3280 ft)
Fixed water-based firefighting systems	Table 4.1. Deluge system (conventional of water mist equivalent) required to be installed.	Clause 7.10.1 Fixed water-based firefighting systems shall be conditionally mandatory in category B and category C tunnels.

Summarising the table above, the application of AS 4825 requires any road tunnel having a length greater than 120 m to be protected by a deluge system. While under the provisions of NFPA 502 any tunnel having a length of not more than 300 m would not be required to be protected by a fixed water-based firefighting system (sprinkler or deluge system) and any tunnel exceeding 300 m may be provided with a fixed water-based firefighting system (sprinkler or deluge system).

Australian Road tunnels through the requirement to install deluge systems are generally acknowledged to be some of the safest in the world. With the emerging fire risk associated with electric vehicles AFAC would be hoping that this remains for the foreseeable future through the ongoing application of AS 4825 or an agreed performance-based design developed in consultation with AFAC.

Fire and emergency services across Australia are equipped and trained to respond to incidents in infrastructure and buildings constructed in accordance with Australian Standards. These standards underpin the design and operation of systems to ensure compatibility with emergency response procedures and capabilities.

The unconsulted application of international standards in Australian buildings and tunnels—without engagement with relevant stakeholders—risks undermining the ability of AFAC members and emergency responders to respond effectively and safely.

For example, international standards may specify different cross-passage spacing in tunnels, which can affect the time and feasibility of fire service intervention during an emergency.

Other concerns include:

- The introduction of non-standard fire bolts in fire doors, which could impede occupant evacuation or restrict fire brigade access.
- The use of lower-quality materials or systems not subjected to Australian performance testing, potentially introducing unforeseen risks, as evidenced in disasters such as the Grenfell Tower fire.
- The broader applicability of international standards that may not align with Australian conditions, risk profiles, or operational procedures.

Personal Protective Clothing

Firefighters and emergency personnel operate in hazardous environments wearing personal protective equipment (PPE) and using operational tools that must meet strict performance standards, informed by assessed risks. Hazards encountered during response operations must, where possible, be eliminated or reduced to an acceptable level. To support this, relevant PPE and equipment standards—both ISO and AS/NZS—define rigorous testing regimes, including criteria such as heat resistance, durability, and washability.

While international standards developed by bodies such as NFPA, ISO, or EN provide valuable guidance, their direct adoption without modification may compromise safety and operational effectiveness. Therefore, any international standard considered for use in Australia should be carefully assessed and, where appropriate, adapted into an AS/NZS standard to reflect the unique Australian context and ensure alignment with national safety and performance expectations.

The National Construction Code (NCC)

It is important to understand the safety considerations built into the National Construction Code (NCC). The NCC, which is administered by the Australian Building Codes Board, is a performance-based code that sets the minimum required level for the safety, health, amenity, accessibility and sustainability of certain buildings. As a performance-based code it already allows industry to apply international codes and standards, but requires a consultative process mandated by the NCC. Consultation with the end users of fire protection and fire brigade intervention equipment is an important part of maintaining safety. Without it safety risk increases as does the cost incurred by fire services.

Concluding remarks

AFAC would caution against the automatic adoption of international standards in the built environment. The current framework allows for specialists in AFAC member agencies to scrutinise the use and application of any international code.

Similarly in the case of PPE, whilst a vast range of ISO and other international standards have application in the Australian context, the differences are sufficient to make automatic adoption of international standards affecting PPE and operational equipment undesirable. This extends to those affecting emergency management-related tasks such as hazardous materials response.

AFAC continue to support the harmonisation of standards across the globe. It's our firm belief that specific Australian and New Zealand operational, environmental, and geographic contexts must be considered and addressed with any adoption of an international standard.

Yours sincerely

Rob Webb
CEO
AFAC

APPENDIX 1: AFAC MEMBER ORGANISATIONS

Full Members (35)

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 Whakaratonga Iwi

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

Queensland
Queensland Parks and Wildlife Service
Queensland Fire Department
Queensland Police Service (SES)

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
Emergency Management 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
National Emergency Management Agency
Parks Australia

Affiliate members (21)
Ambulance Tasmania
Australasian Road Rescue Organisation
Australian Civil-Military Centre
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
Geoscience Australia
Hong Kong Fire Services Department
HQPlantations Pty Ltd
Melbourne Water
National Emergency Management Agency
Te Rākau Whakamarumaru New Zealand
National SES Volunteers Association
NSW Department of Primary Industries
NSW Environment Protection Authority
Pacific Islands Fire & Emergency Services Association
Royal Flying Doctor Service, Western Australia
Surf Life Saving Australia
VRA Rescue NSW