

Fire Protection Industry (ODS & SGG) Board





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A message from Fire Protection Industry, (ODS & SGG) Board Executive Officer, Mr Paul Hodgson



The FPA Australia Board of Directors are grateful that the department has entrusted FPA Australia with the responsibility of administering the Fire Protection Industry Permit Scheme to help facilitate a compliant industry when it comes to the use of scheduled extinguishing substances. I wish to extend my gratitude to the department and its staff for their tireless work and ongoing support of the ozone program, which I believe has reached a mature point where operational processes have become refined.

This period, covering 1 July 2022 to 30 June 2023, saw the Fire Protection Industry (ODS & SGG) Board (FPIB) undertake a large scope of work across five key strategic objective areas: technology, compliance, industry engagement, discharge reporting, and training.

After coming out the other side of the COVID-19 lockdowns, the team have adapted well to the hybrid working environment and remain connected through a combination of office based work and technological platforms such as Teams, Zoom, and email when working from home. Technological adaptations have been crucial in helping us meet all the deliverables set out in the Annual Work Plan and Services Agreement.

Completing these activities to a high level is crucial to ensuring we continue to gradually progress toward the end-goal of reducing the emissions of all ozone depleting substances (ODS) and synthetic greenhouse gases (SGG). I thank the FPIB team for their ongoing hard work and dedication to ensure we continue to meet key objectives and enhance the ozone program year-on-year.

I must also make mention of our Industry Advisory Body members Ray Walton, Elvira Nigido, John Nightingale, Bob Grieve, Daniel Wilson, and Brett Staines for their assistance and support of the program throughout the year. These individuals are all industry leaders in their respective fields, and we are privileged to be able to call on their expertise when needed. We thank them for their invaluable contribution.

I would also like to thank the Ozone staff for their tireless dedication to the permit scheme and its operations. Their hard work makes my job easy and ensures we are all working optimally to reduce emissions within the fire protection industry.

Lastly, it would be remiss of me not to acknowledge those within the fire protection industry that do the right thing and abide by the legislation by obtaining a fire protection industry permit. By doing so, those individuals are supporting the objective of the Ozone Protection and Synthetic Greenhouse Gas Management Act 1989 (the Act) which is to reduce emissions.

Besides the obvious financial cost, there is a lot of hard work involved behind the scenes for fire protection technicians and companies to become licensed. They must firstly undertake training with a registered training organisation, and then develop the necessary skills to competently undertake their professional work. Having licensed and aptly skilled technicians is critical in reducing the risk of ODS and SGG emissions.

Although there is still a lot of hard work to be done by FPA Australia and the FPIB moving forward, we feel we have made valuable inroads over the past year to further promote the importance of the Act and the regulations that underpin the Fire Protection Industry Permit Scheme. We look forward to continuing our strong partnership with the department to deliver the ozone program over the coming years.

Paul Hodgson

Executive Officer, Fire Protection Industry (ODS & SGG) Board





Introduction

Fire Protection Association Australia (FPA Australia) provides services to the Department of Climate Change, Energy, the Environment, and Water (DCCEEW) through the establishment of the Fire Protection Industry (ODS & SGG) Board (FPIB).

This involves the administration and implementation of the Fire Protection Industry Permit Scheme, which includes the granting of fire protection industry permits to individuals and businesses in accordance with Division 6A.4 of the regulations. The Fire Protection Industry Permit Scheme covers the handling, storage, acquisition, and disposal of extinguishing agents that are listed in Schedule 1 to the *Ozone Protection and Synthetic Greenhouse Gas Management Act 1989* (the Act).

Background

The FPIB administers the fire protection division of the regulations on behalf of the Australian Government.

Functions of the FPIB include:

- Identification, promotion, and support of best practice activities throughout the fire protection industry.
- Management of the permit and licensing system to ensure applicants meet minimum standards of competency prior
 to the granting of extinguishing agent handling licences (EAHLs) and extinguishing agent trading authorisations
 (EATAs). Functions also extend to halon special permits, and special circumstances exemptions.
- Implementation of effective communication and consultation with the fire protection industry to encourage and facilitate regulatory compliance.
- Development and distribution of ozone depleting substance and synthetic greenhouse gas (ODS and SGG) learning and assessment resources to support those working in the fire protection industry.
- Undertaking review and audit activities to ensure fire protection industry compliance with the Act



Purpose

This report focuses specifically on the FPIB's schedule of work from the period 1 July 2022 to 30 June 2023. It is an annual synopsis of outputs for the year incorporated with analysis of performance outcomes for activities completed under the five strategic objective areas. These are:

Compliance

- 1. Training
- Technology
- 3. Industry engagement
- 4. Discharge reporting

Strategy

The development of the strategy for the 2022-2023 Annual Work Plan (AWP) was a collaborative exercise between the Department, the Industry Advisory Body (IAB), and the FPIB.

We considered it important to consult with all the key stakeholders to ensure we could develop an AWP that will target the right areas of a diverse fire protection industry at this given time. This strategy provided the FPIB with a clear vision of what we hoped to achieve by the end of the five-year contract period, as well as a roadmap for how this will be achieved – with short, medium, and long-term goals identified.

To maintain a consistent approach, the 2022-2023 AWP was underpinned by the five key strategic objective areas that were agreed to at the beginning of the contract period. In terms of the direction of our strategy from this year compared to 2021-2022, there was no major shift in our approach. Instead, we were committed to building on the work that was done during the previous year, with particular emphasis on building our resources for and implementing the beginnings of the Field Engagement Program.

While industry engagement was again the cornerstone of our AWP, we were also eager to boost our compliance reach. We must thank the Department for its support in allowing us to undertake both a pilot version of our Field Engagement Program, and then later in the financial year, the implementation of the program across some states of Australia.



While compliance activities can certainly be undertaken remotely, having the ability to enter the field gives us an enhanced level of engagement, where we can observe our permit holders from a true operational and individual perspective.

During the 2022-2023 financial year, the FPIB strategised to further engage the mining sector, which historically has proven difficult. In effort to make greater inroads with the mining sector, the Board devised an engagement strategy that saw us adopt a more holistic approach. Part of this strategy saw us tailor our language and messaging more toward environmental sustainability and encouraging to where practically capable, swap scheduled extinguishing for environmentally cleaner alternatives.

This messaging of promoting sustainability was emphasised throughout our strategy and in-turn, all sector activities and communications. For the 2022-2023 financial year, the Board wanted to educate and remind license holders of how human behaviors affect the natural environment.

Strategic objective areas

Compliance

Field Engagement Program

In the 2022-2023 financial year, the FPIB successfully launched the Field Engagement Program after delays caused by COVID-19. Spearheaded by the Board's Field Engagement Team, the program underpinned the Board's strategy in promoting compliance industry wide around Australia, with a goal of educating on best practice where needed and gaining a further understanding of the level of compliance across the country.

In July 2022, the Board began this process by reviewing the Field Engagement Plans developed in 2020. The conclusion was that no changes were needed, and the Board collaborated with Department to finalise the Field Engagement plans in July 22, 2022. The extensive plans and refined documentation gave the Board confidence in the program's success as they gave strategic guidance to the creation of a successful engagement program.





The Field Engagement - Pilot Program

Starting at the end of 2022, the Pilot Program began by notifying license holders, and an article was published in the December GasBag. The article was well-received, with the self-assessment checklists linked within the article having the highest click-rate within the GasBag, indicating program success.

The Pilot Program initially reached out to 10 sites in metro Melbourne, but received a limited response. Expanding efforts to 26 sites across Victoria resulted in more responses, with three permit holders able to commit to visits before the end of 2022.

Positively, the three site visits in Victoria throughout the Pilot Program demonstrated a willingness from the Permit Holders to engage with the safety requirements involved in dealing with ODS and SGG extinguishing agents. It also provided permit holders with an understanding of the



environmental repercussions of handling scheduled agents, and the significance of staying compliant in accordance with relevant legislation. Compliance was high across each of the visits throughout the Pilot Program and positive feedback was received from the Permit Holder's visited. Each site visited expressed that they appreciated the visibility of the FPIB in the field.

Following on from the successful delivery of the Pilot Field Engagement Program, the Board published an article in the December 2022 GasBag. Highlighting the Board's intention to expand the program, the article focused on the program's usefulness in helping the Board better understand how it can help business stay compliant, find solutions, and overcome any barriers they may face.

Expansion of the Field Engagement Program

The success of the Board's collaboration with the Department of Climate Change, Energy, Environment and Water (DCCEW) on the Metro Melbourne Pilot Program led to the program's expansion, with site visits in New South Wales and Western Australia conducted in early 2023.

Pleasingly, most permit holders visited across both states, saw positive outcomes, going above and beyond with their compliance, safety, record keeping, and paperwork. However, some instances of poor practice and non-compliance were identified in both New South Wales and Western Australia.

Instances of non-compliance reported in New South Wales and the FPIB's responses included:

- No proof of leak detector maintenance.
 - The Board notified this business that this was non-compliance, as no proper maintenance was carried out on their leak detector.
- No maintenance records being kept for leak detectors, vacuum pumps, or recovery units.
 - The Board discussed with this business's Technical Manager, how this could be rectified. They were in agreeance that they would initiate record keeping for maintenance of the above, that was then received by the Board in early April.
- Inability to provide Risk Management Plan (RMP's).
 - Though this was not technically an instance of non-compliance that the Board was specifically looking for, it was still a cause for concern. In response the Board requested a copy of an RMP that was sent to the site's General Manager.

As three sites were found to have non-compliance, the Board recognises that this would not have been uncovered had it not been onsite in New South Wales. Providing education to these companies on how to rectify their non-compliance and putting steps in place to ensure it, was an invaluable investment.



Instances of non-compliance reported in Western Australia and the FPIB's responses included:

- Unknowing of obligations to report discharges (accidental or due to a fire)

 The Board provided the representative of this site with instructions on discharge reporting, including where the form can be found on the FPIB website, how to submit it and requested a retrospective report be provided to the Board. This report was provided.
- Unavailable records of agent required, disposed of and recovered from equipment during each quarter
 The Board reminded this business that while they may not have an agent to report each quarter, they must still
 submit a 'NIL' report at each quarter. The Board provided them with a template of the Quarterly Usage Report form
 and asked them to submit their reports for the previous 12 months/four (4) quarters, to December 2022, by the end
 of March 2023. The board let them know that a reminder would be sent for the next Quarterly Usage Report around
 the end of March 2023.

Throughout this period the Board received positive feedback alongside recommendations that there is a need for actual face-to-face training available in Western Australia. For technicians to be able to train in fire protection, including the handling of ODS & SGG, they are limited to only online courses or must travel to the East Coast which comes at great expense to RTO's.

The learnings from Western Australia, also highlighted the largely unregulated nature of the state's fire protection industry and emphasised the need for mandatory compliance visits to obtain a clearer picture of industry practices. In response to this an educational flyer on proper procedures for ODS and SGG use was created in April 2023.

In May, an email encouraged permit holders to complete self-assessment checklists. The response was positive, with high open and click-through rates. A survey which was also distributed to industry individuals in June reflected positive feedback on the self-assessment checklists. Areas for improvement that were identified from the survey, referred to increased awareness and online accessibility.

Overall, the Board was satisfied with the outcomes of compliance activities throughout the year, particularly the success of face-to-face engagements after COVID-19 restrictions were lifted. This was the most vital activity conducted as it marked the beginnings of a program that can truly ensure compliance. The experiences gathered will guide improvements for the upcoming year with an expanded program and enhanced visibility from the Board across the country. The success of these site-visits conducted throughout 2022 and 2023, is demonstrative of the importance of face-to-face interaction and engagement with businesses and industry in educating and ensuring compliance.







Technology

Throughout the 2022-2023 financial year the Board continued to monitor any new relevant Australian Standards or technologies and furthered its work engaging with industries on their attitudes and actions regarding clean alternatives to Ozone Depleting Substances or Synthetic Greenhouse Gases.

To gain a clearer sense of industry sentiment and focus within this area, the Board put together a highly engaged with survey.

In summary, the findings reflected a positive outcome to the Board, as increased use of cleaner alternatives had been found and pleasingly, participants used a wider range of cleaner alternatives compared to scheduled gases. Findings revealed a high interest in moving to alternatives as much as possible and a call for stricter regulations and clearer messaging to help ease the transition in an effective time-period. These results made it clear; the Board needs to continue to take clear action on increased messaging and communications regarding the importance of cleaner alternatives and push for increased education industry wide.

Whilst these results were pleasing and there appears to be a shift in mindset regarding the uptake of non-scheduled alternatives, the Board is aware that there are still several significant barriers in place that prevents more businesses from making a transition. The main issues are in the cost of transitioning, alternatives not always being fit for purpose, and the varying availability of cleaner alternatives on the market.

In the coming years, there is even more work for the Board to do in reaching sections of our industry to educate them on the benefits of moving to alternatives that significantly reduce the harm done to the environment if discharged. The Board hopes to report on an increasing appetite and implementation of cleaner alternatives in the fire protection industry. Recognising companies who are transitioning through 'industry awards' is another initiative the Board looks to focus on to encourage greater uptake.



Industry Engagement

Throughout the 2022-2023 financial year, the Board concentrated heavily on working in the industry engagement space as a key course of action in better understanding current industry practice and continue educating industry on compliance and the permit scheme.

As with previous years, four key areas of industry were identified as being critical to engage with:

- Mining
- Facilities Management, Building & Construction
- Aviation
- Maritime



Mining

Beginning the financial year, the Board first connected with the mining sector, through key stakeholder, the Association of Mining and Exploration Companies (AMEC). As a leading voice of Australia's mineral exploration and mining industries, engaging with this stakeholder was deemed to be a key pathway to connecting with more members of the sector. Connecting with this mining body was fruitful in highlighting the Board's work and gaining a further understanding of AMECs.

The work engaging within this sector continued later throughout the year, with the Board's attendance at the WA Mining Conference in Perth, where educational and promotional flyers were distributed to approximately 3000 attendees. With attendees working across a range of roles and organisations, these flyers were collected by a diverse range of professionals including fire protection technicians, environmental managers, mid-to-senior level managers and managers directly involved with hands-on equipment. Having been able to share these resources so widely and facilitate face to face conversations amongst such a wide and diverse cohort of industry workers was an incredibly valuable exercise in expanding the Board's audience, reach and visibility.

In November, the Board then identified influential mining associations in Queensland. Focusing on this state requires a nuanced approach, as compliance requires dual licensing at both a federal and state level via the Queensland Building Construction Committee.

At the end of the financial year, the Board re-analysed mining-related activities, emphasising increased discharge reporting, compliance awareness, discharge prevention, and reminded Queensland technicians of dual-licensing requirements. Positively, the goal of increasing discharge reporting was achieved, with 11 reported discharges in 2022-2023, compared to five in the previous year.

The Board continues to be satisfied with our engagement with the mining sector throughout the year, and this sector will continue to be a key area of focus within the next upcoming financial year. Key areas of focus that have been identified include increased communication on mining related material enhanced face-to-face engagement.



Facility Management

In December 2022, the Board reached out to the Facility Management Association of Australia (FMA) to connect with the Facility Management Sector with communications that focus on verifying industry permits. This was a highly successful way of engaging with members of this sector as the FMA responded positively, publishing an article written by the Board in their newsletter and on their website. Having the article included within the FMA's publication proved to be a valuable way of extending the Board's direct reach, with approximately 300 facility managers subscribed to the newsletter.



Maritime & Aviation Sectors

Throughout the 2022-2023 Financial Year the Board largely engaged with the maritime and aviation industries through its own communication channels. This included an educational article on fire protection requirements in the maritime industry in the March 2022 edition of Gasbag and a maritime site visit conducted in Western Australia.

In the aviation space the Board continued its engagement through educational collateral including fact sheets and articles available on the FPIB website and continues to work on ways to engage with the sector, whilst maintaining compliance and ensuring all recorded discharges are managed appropriately.

National Halon Bank

An important dimension of the Board's industry engagement throughout the financial 2022 – 2023 financial year was its engagement with the National Halon Bank (NHB). In August 2022 the Board conducted an in-person meeting with the National Halon Bank (NHB), aiming to formulate a strategy for engaging in efforts to decrease the number of halon refusals at fire stations. However, a complication arose during the discussion regarding challenges the NHB was facing with courier services. Consequently, all communications related to halon were halted until the collection issue was resolved. Regrettably, this matter persisted throughout the entirety of the 2022-2023 financial year.



Discharge reporting

The Board focuses on discharge reporting across all sectors and is continuously reminding industry to ensure they are reporting any discharge incidents – either accidentally or with the purpose of extinguishing a fire and following best practice. In the last year across all sectors there were a total of 55 discharge incidents reported to the FPIB.

- Mining 16
- Aviation 14
- Building and Facility 4
- Marine 3
- Renewable Energy 1

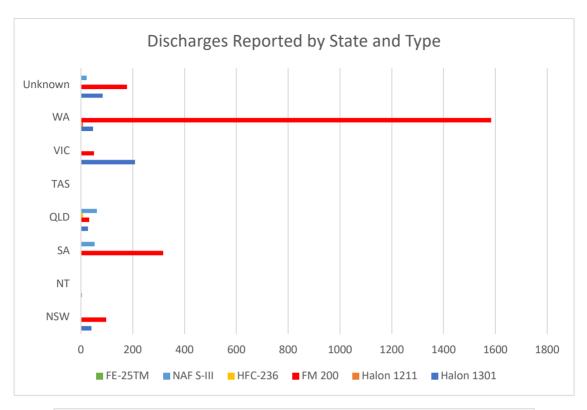
In terms of reported amount and type of scheduled agents discharged over the past year, the most discharged agent was FM 200. This is not surprising, given FM 200 is one of the leading replacements for Halon, with approximately half the global warming potential. The most FM 200 was reported to be discharged in Western Australia and South Australia, which was also unsurprising, as most of these discharges of FM 200 came from the mining sector in these states. The total reported amount of FM 200 discharged was 2,259.2kg.

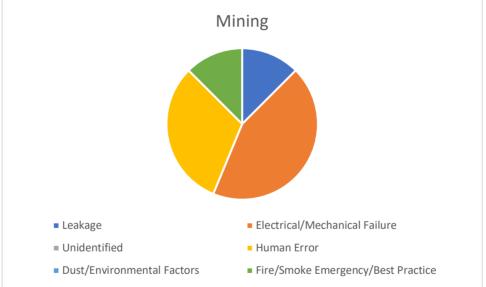
Halon 1301 was the second most reported discharged scheduled agent in the last year, with 410.482kg reported to be discharged, predominantly in the Aviation sector, which is still the highest user of Halons. NAF S-III followed, with 137kg reported to be discharged followed by Halon 1211, which had 8.7 kg reported to be discharged. This was proceeded by HFC-236 which had 8.7kg reported to be discharged and FE-25™ which had 1.1kg reported.

Overall, whilst the Board would always prefer there to be no need for discharges, it is pleased to see an increase in reporting from the previous year. This means that there is a higher level of transparency, a greater level of understanding of why and how discharges are occurring, knowledge of overall emissions, and a greater opportunity for the Board to engage with business on best practice. The Board wills always encourage self-reporting to ensure accurate record keeping and compliance.

The below graphs detail the recorded discharges across each sector and their causes.





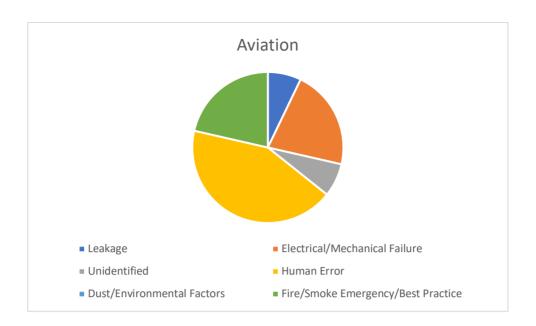


In the last year there have been 16 reported discharge incidents in the mining sector. Of these, electrical/mechanical failure was the main listed reason (7), followed by human error (5), and actual fire/smoke emergency or best practice (2) and leakage (2).

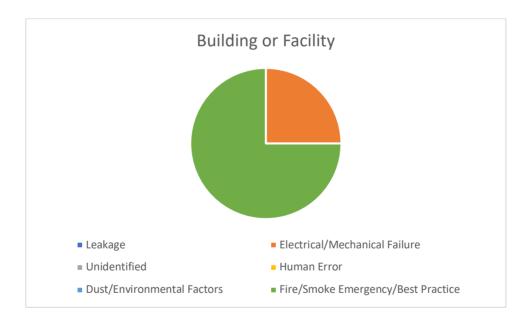
The Aviation industry reported a total of 14 discharge incidents in the last year. The most common cause of these discharge incidents was human error (6), actual fire/smoke emergency or best practice (3), electrical/mechanical failure (3), leakage (1) and unidentified cause (1).

With the most common reason for discharge being human error, the Board have been providing education around minimising the incidence of these by way of educational fact sheets, targeted specifically at the Aviation industry.



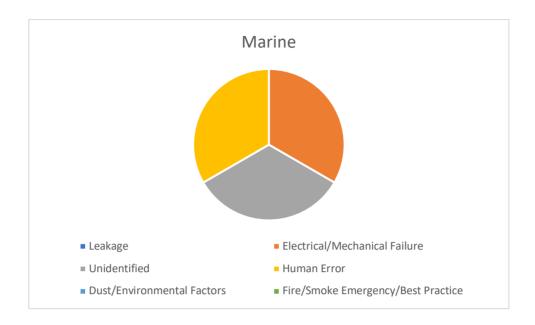


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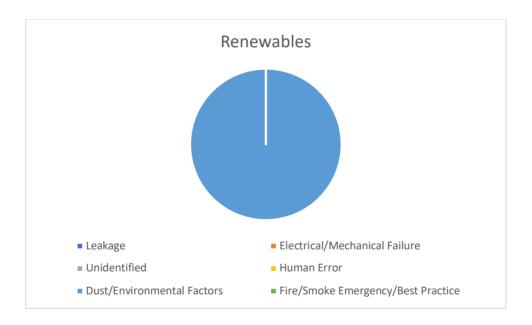


The Building and Facility sector reported 4 discharge incidents in the last year. The most common cause of these incidents was actual fire/some emergency (3), and 1 discharge incident being an electrical/mechanical failure.





The Marine industry saw 3 reported discharge incidents in the last year. 1 incident was caused by an electrical/mechanical failure, 1 incident was caused by human error, and 1 incident is of an unidentified cause.



The Renewable Energy sector is a new sector that the FPIB have not had discharge reports from previously. While this discharge report technically came from a solar farm on a mine site, the FPIB have discovered that the renewable energy sector use scheduled fire protection gasses as their main fire protection in both solar and wind energy production. FM 200 appears to be the main scheduled agent used in wind turbines for their fire protection, and this is also true for solar farms.

There was 1 discharge incident reported in the last year for the Renewable Energy sector, which was caused by dust/environmental factors.

In summary, the Board is pleased with the increase in reporting coming out of the mining sector in the last year, and believes that our presence at several mining conferences, and reaching out to this sector directly has had some impact on these discharge reports being submitted.



The Aviation industry appears to have a high level of human error, which the Board takes seriously and will continue to work together with the industry to try to decrease their incidence of discharges due to human error.

The Renewable Energy sector is one which the Board was not previously aware of as a user of scheduled extinguishing agents, however, upon it being brought to our attention that they are regular users of scheduled extinguishing agents, we feel it is appropriate to place a focus on this sector over the next year.

Training

Training remains an integral part of ensuring industry compliance and continued to play an important focus of the Board's work throughout the financial year.

With this in mind, furthering our understandings of how to best work with industry on training was a key area of focus for the Board. To do this and to best engage with organisations across the industry, the Board put together an explanatory article highlighting how to report problems with training content or delivery on the FPIB website. This article was published in the September 2022 issue of GasBag, the Board's industry newsletter.

In the same month, as a direct action that arose from previous discussions with EAHL training providers throughout 2021 and 2022, the Board created a flyer for training providers to share with graduating students about the license application process.

This informational material was distributed to training providers across the country, including FPAA, TAFE NSW, Pacific Institute of Training (PIT), and Fire Industry Training (FIT). Each provider received 200 flyers at the time of distribution with more flyers available upon request, and the Board passes on its gratitude to each provider for their support in facilitating awareness and training compliance.



The following month in October 2022, the Board reached out to stakeholders for feedback on the current units for each license type, with several organisations and individuals providing feedback. A common issue highlighted, concerned Unit 5 within the EAHL license types. This feedback was sent to the Department for their consideration in assessing the current regulations and its effects on the evolving needs of the training industry. The Board thanks those who participated and contributed their insightful ideas on improving the Units of Competency.

Overall, the Board is happy to advise there are no immediate concerns or impending updates relating to the permit schemes and relevant courses. There are two Skilled Service Organisations (SSOs) that are relevant to the FPIB's permit administration scheme – the Artibus Innovation and Australian Industry Standards (AIS) who advise on industry training projections and requirements for the upcoming year. With neither organisation having made any changes within the last year, no impending updates within the next financial year are likely to be made to any courses related to the permit schemes and the delivery of the UoC will continue as usual.





Analysis of outcomes and identification of ongoing or emerging areas presenting risk of emission and opportunities for future activities

In assessing the outcomes of our various engagements with industry stakeholders, it is clear certain areas present greater risk of emission than others.

An ongoing risk of emission that the FPIB observed this year was complacency among technicians. After analysing the discharge notifications received this year, it was concerning to discover that roughly 40 per cent of these could have been avoided by technicians following correct procedure or simply taking more care.

There were examples of a suppression system discharging because of an individual accidentally knocking an activation point, not isolating the system properly, or simply pressing the wrong button on a fire panel interface. These are all examples of simple errors that can easily be avoided with more care.

To counter this, the Board developed promotional material aimed at following the correct procedure in the field. This informational material incorporated a handful of simple tips that technicians should follow to reduce the chances of discharging, as well as serving as a reminder to the harm that comes to our natural environment when these scheduled substances reach our atmosphere. It also emphasised the fact that penalties can occur if the correct compliance is not in place, which should provide extra motivation for licence holders to follow-out best practice.

The FPIB will continue to offer education to permit holders as much as possible, however, it is challenging to completely mitigate these issues for technicians demonstrating a lack of care or concentration, resulting in a discharge. This type of skill centric education may need to be addressed by the registered training organisations that deliver the relevant fire protection training modules. The FPIB is planning to reach out to those specific organisations in the 2023-25 AWP for clarity around what could be causing these common errors.

The proposed Field Engagement Program and intel gathering activities will also be able to aid the Board in better understanding how these discharges are occurring, what enhanced steps can be put in place, and also serve as a reminder that the FPIB will continue to be a strong presence in ensuring compliance.

The Board believes that the mining sector also poses an ongoing emissions risk, especially the smaller operators. Compliance among the larger mining corporations has been found to be quite good as they generally have strong corporate governance and environmental policies. On the contrary, it is much harder to reach the smaller operators, particularly the ones based in remote locations.

Undoubtedly, the biggest challenge is ensuring all mining companies at minimum have an awareness of the Fire Protection Industry Permit Scheme and the Board's key priority within this industry is tailored to creating greater awareness of the national licensing requirements. This is particularly important, because this industry is a transient industry where people come and go regularly, making it more difficult for mining companies to verify the qualifications of their staff and monitor compliance.



The Board will continue to push the message that mining corporations must only contract licensed technicians to perform work on site relating to suppression systems and extinguishers containing scheduled extinguishing substances; or ensure their internal technicians have undertaken adequate training. A focus of messaging to this sector moving forward will be emphasising the fact that discharging a scheduled agent can cause significant business disruption to mining sites, particularly at remote locations where there are no technicians on-hand or close by. The Board will continue its advocacy of using licensed technicians to help minimise this risk.

Another risk which has always been there, but one that has been raised more in the past year, is those operating without the correct licence. It has been raised both by IAB members and from permit holder feedback. The Board has always tried to push the messaging of needing a Commonwealth licence but are aware that many may ignore this or not receive the message entirely. For the proposed 2023/2024/2025 workplan, the FPIB has plans in place to enhance and streamline our procedures in identifying 'out-side operators'. The Field Engagement Program plays a major role in this, as having Officers out in the field, around the country, is the ultimate tool in identifying those operating outside the law. Bringing these individuals/companies into the permit scheme will allow us to ensure they are compliant, and in-turn, reduce emissions.

The Renewable Energy industry is a sector that the Board has not engaged with, nor have much information on. It was during the 2022-2023 financial year that the Board received its first discharge report from the Renewable Energy sector. As an unexplored sector, it poses a risk to emissions. The Board has proposed extensive intel gathering and engagement with this sector for 2023/2024/2025, in order to rectify this and reduce the risk.

Looking ahead long-term, suppliers having difficulty in getting new alternative (non-scheduled) technologies to market could pose an emissions risk, simply because it will mean more traditional agents are being used. After holding a meeting with Kidde Australia in March 2021, the Board learned that they had encountered problems getting a certain product containing inorganic compound to market, as it does not use pressurised storage or liquid. As there is no standard for this type of technology in Australia, end users are extremely hesitant to purchase it Kidde explained.

Kidde informed the Board that because development of a new Australian Standard to include this type of technology would typically take years, there is currently little incentive for fire suppression equipment suppliers to invest in these types of products even though they are environmentally friendlier solutions.

While this is only one specific example, this could very well become a more common problem as more alternatives arrive in the future. Quite simply, the more alternatives being used across the different industry sectors will mean fewer harmful emissions of ODS and SGGs in the future. While this is a complex problem and has been brought to the attention of the Department before, we believe it needs to be highlighted again. The Board aims to increase the appetite for cleaner alternatives and the market needs to be able to accommodate this.

For the upcoming strategic plan, the FPIB will be increasing communique on the different kind of cleaner alternatives and their benefits. We have also proposed an 'Industry Award' for those companies that are making the switch to cleaner alternatives. In the coming years it may be worth the FPIB and the Department meeting to discuss what can be done at an Australian Government level to potentially create incentives that would encourage companies to switch to environmentally cleaner alternatives.

While the FPIB understands this course of action would be a major process and out of the Board's control, it would not hurt to at least start the discussion to gauge what could be implemented in the future to help drive the uptake of alternatives, with the aim of minimising emissions.





Permit activity data analysis

The below explores a consolidation of data required under the Board's Monthly Permit Activity Reports, with supporting analysis that identifies changes and trends, their context, drivers and contributing factors.

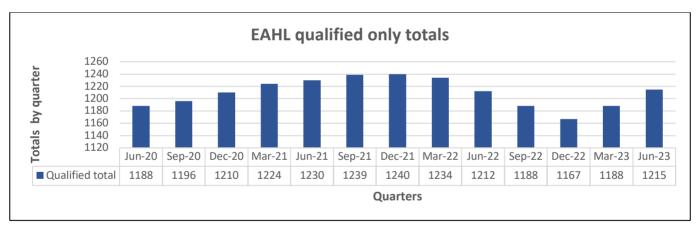
The Board would like to preface this section of the report by saying the FPIB's permit data is difficult to analyse and identify true changes and trends primarily because of two reasons:

- 1) New individuals and companies are continuously entering the permit scheme, while established individuals and companies sometimes exit it once their permit has expired, meaning permit numbers can bounce up and down.
- 2) We do not have the benefit of a large database to work with and extrapolate.

At the close of the 2022-2023 financial year, the FPIB had a total of 1,562 permit holders. This included extinguishing agent handling licences, extinguishing agent trading authorisations, and halon special permits. A permit scheme of this size means that any trends are generally less pronounced than what would be evident in larger permit schemes, with a broader database such as the Australian Refrigeration Council, for example.

Break down of different licence types

EAHL – qualified persons

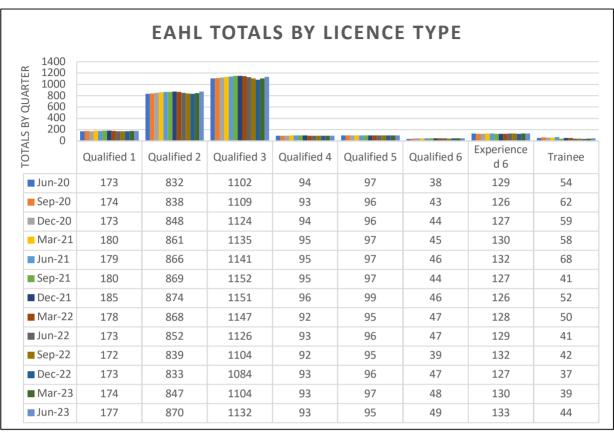


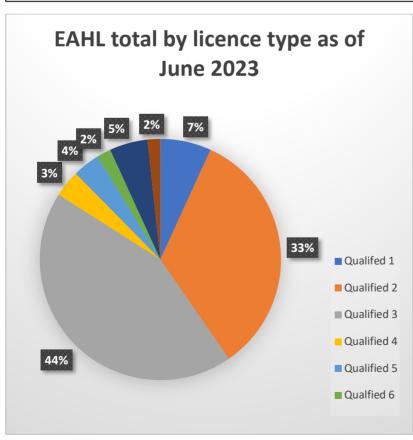
As seen in the above graph, the number of individuals holding a EAHL – qualified persons, varied throughout the course of the 2022-23 year.

As evident above, there was a small decline by the end of the second quarter, as we saw the numbers drop by 21 EAHL holders. The Board believes this was due to a number of EAHL holders licence's expiring in November and December, and as this is generally a holiday period, individuals let their licence lapse. As you then see the numbers jump back up in the third quarter to the same number as September, also reflects this. The Board goes to great lengths to remind licence holders months prior to their expiry date that their licence is up for renewal, however, this data reflects licence holders perhaps not feeling an urgency to renew before their due date.



EAHL totals by licence type







As seen in the graphs above, EAHL – qualified persons 2 and 3 remain the most popular licence types, while the other remaining licences make up a smaller portion of the overall number of permits in our database.

EAHL – qualified persons 2 and 3 will always be the most commonly acquired licence type in our permit scheme, as they entitle a technician to undertake the most common skills and sought-after services, such as fixed system installation and decommissioning (2) and fixed system testing and maintenance (3).

As can be seen across the other licence categories, permit numbers remained virtually the same with very little fluctuation besides trainee licences, which we will elaborate on further down this section of the report. The lack of change to these permit numbers could possibly indicate that there is not as much appetite from fire protection employers to have their staff trained in units of competency relevant to the licence categories outside of EAHL – qualified persons 2 and 3.

For example, a company holding a EATA may not need to get a member of its staff licensed under category 4: recovery, reclamation, fill and recycling because they buy direct from a licensed supplier that does that process and has the cylinder(s) sent straight to the end-user.

Trainee licences

A trend that did emerge this year and one that we were able to clearly identify, was a slight decrease in the number of individuals holding a trainee licence, compared to that of previous financial years.



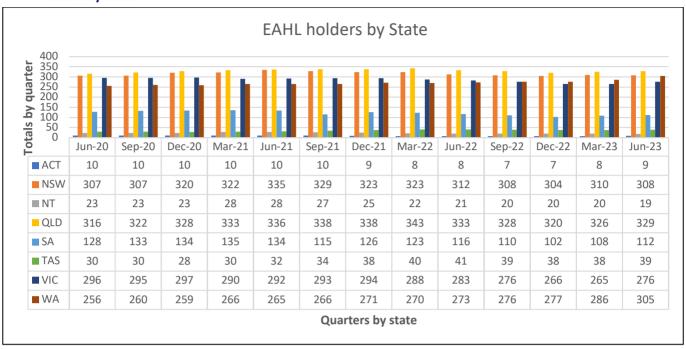
A decrease of 23 trainee licence holders between the 2021-2022 and 2022-2023 financial years can be identified.

This decrease the Board believes does not reflect the industry, and as a result have it made a strategic project to ensure those coming into the industry are licenced. A trainee obtaining a licence with the FPIB relies on both the worker to be aware and the employer- the Board has proposed strategic activities that target both and hope to see this number increase.

Despite this downward trend, it is important to remember that the number of trainee licence holders in the FPIB database will continue to fluctuate year on year as trainees transition to an EAHL – qualified persons licence.



EAHL holders by state

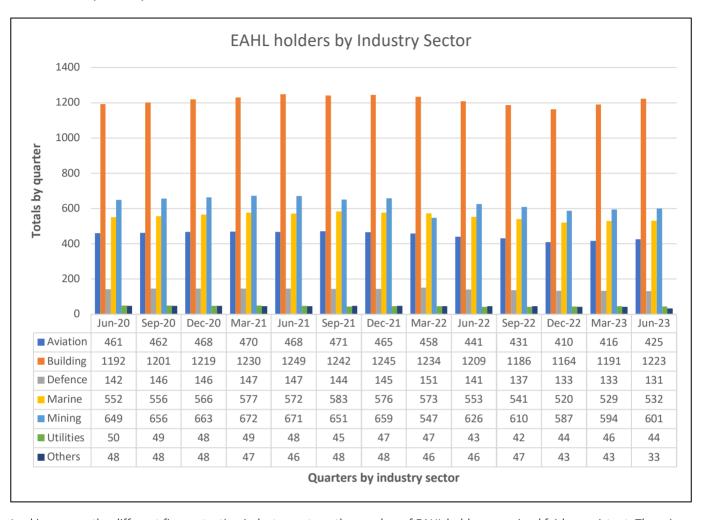


As seen in the graph above, the number of EAHL holders in the smaller states and territories remained fairly stable throughout the 2022-2023 financial year.

The increase in EAHL holders was most notable in Western Australia. The Board is very pleased to see this, due to Perth being a large mining state. The mining sector is an industry that has historically needed continuous work to ensure compliance, including all technicians who work with scheduled gases to be correctly licensed.



EAHL holders by industry sector

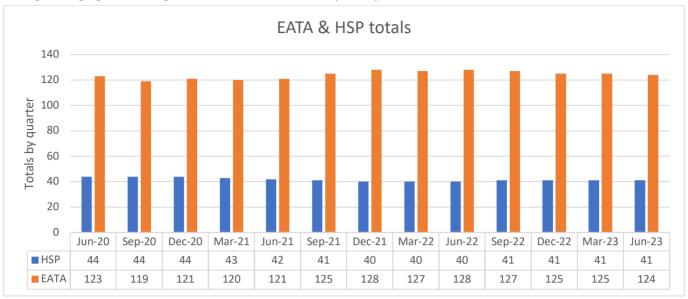


Looking across the different fire protection industry sectors, the number of EAHL holders remained fairly consistent. There is no data here that points to any trend of note.

It should be stated that these numbers are not entirely accurate as technicians can be listed as working across multiple sectors by their employer, when in reality, they may only work in one or two.



Extinguishing agent trading authorisations and halon special permits



As seen in the above graph, the number of companies holding an EATA and HSP has remained very steady over the course of the year.

We do not expect the number of HSPs to increase significantly moving forward as halon is rarely required other than in Defence and aviation platforms. This figure may in fact drop substantially when a suitable alternative to halon is discovered and widely adopted in the future but for now, we expect these figures to remain steady with only subtle variations.

In the coming years it will be interesting to monitor if the number of companies holding an EATA dips once HFC quota is further reduced as part of the phase-down. With less agent such as HFC-227ea available for import, some companies may decide not to renew their authorisation once it has expired as they no longer see the value in trading agent.



A forecast of permit activity based on the analysis to identify risks and potential treatments to ensure the ongoing effective delivery of the permit scheme.

In forecasting permit activity moving forward, the FPIB has no reason to believe that any risks will emerge that could impact the ongoing effective delivery of the permit scheme.

EAHL, EATA and HSP renewals due 2023-2024

2023	EAHL	EATA	HSP	SCE
July	21	3	0	0
August	19	1	0	0
September	19	0	1	0
October	30	3	0	0
November	42	1	1	0
December	55	1	0	0
	300	17	4	1
2024	EAHL	EATA	HSP	SCE
January	25	0	3	0
February	33	3	1	0
March	36	2	4	0
April	18	2	4	0
May	45	8	2	0
June	33	2	1	0
	218	26	22	0
Totals	518	43	26	1

Forecasting ahead to the 2023-24 financial year, the FPIB's licensing team of Blenda Palmer and Kellie McMahon are set to have a relatively busy year processing permit renewals, with 518 EAHLs due to be renewed between July 2023 and June 2024. Overall, there are 588 licence renewals to be completed in the 2023-2024 financial year.

While 588 renewals is a large number, the FPIB's licensing team have proven they are more than capable of managing this workload.

With the way the Fire Protection Industry Permit Scheme is structured in terms of EAHLs lasting three years before expiry, the permit processing workload tends to vary in cycles.



The Industry Advisory Body, and a summary of key and outstanding issues and recommendations made by the body

The FPIB was fortunate to have the continued support of our Industry Advisory Body (IAB) members Bob Grieve, Brett Staines, Daniel Wilson, Elvira Nigido, and Ray Walton. However, Daniel Wilson did leave the Board during March 2023, due to a promotion which took him away from the fire protection industry.

Overall, the FPIB is satisfied that the IAB is a well-balanced panel of industry experts that assisted us with meeting our strategic objectives, as well as help us to identify new areas where our focus should be targeted toward in the future. It is important that we continue to have representation from across the different sectors of the industry when it comes to the IAB to ensure a well-rounded view of the industry.

John Nightingale provides invaluable knowledge on the maritime sector and the challenges that exist there to ensure compliance with the legislation. Ray Walton is our aviation expert and although he has officially retired, he has advised us he still has his finger on the pulse and is looking into doing some consultancy work.

Working for major suppliers, Bob Grieve provides valuable resources when it comes to analysing market trends and emerging technologies. Despite not working at the industry coalface anymore, Brett Staines' understanding of new Australian and international Standards continues to be valuable, while Elvira Nigido is obviously an important link to the National Halon Bank and what is happening there.

Working with each of member of the IAB has been of vital importance to the Board success within the last financial year. Every members individual expertise and unique knowledge has been instrumental in guiding the year's activities. Moving ahead, the FPIB is eager to gain further buy-in from the IAB and is confident this will lead to greater insights and targeted intelligence gathering from specific sections of the industry that require further education.

Considering all the information outlined above, the FPIB was happy to renew the position of each IAB member for the 2023-24 year. Whilst the Board is aware the structure and conduction of the IAB may be changing in the upcoming years, we still believe those who have been on the Board have and can continue to provide instrumental insight into the fire protection industry.



Conclusion

In the context of the large scope of work that was undertaken by the FPIB over this period, we believe we have taken strides toward achieving our ultimate goal of reducing emissions of scheduled extinguishing substances. Engaging with industry face-to-face has been high point of this financial year and one that we have seen many successes from.

Through a combination of communicating with industry stakeholders, collaborating with the department, and being guided by the IAB's expertise where necessary, we have made valuable inroads in understanding industry trends and issues. This means we now have greater scope to plan future engagement and education activities in areas they are most required.

We can look back at all the work that was undertaken this year and be proud of our efforts as a collective. We made ground with the Field Engagement Program; we believe this engagement will hold us is in good stead as we work more with this program and expand it. Working with the industry to educate and ensure compliance in the field, is an invaluable tool in reducing emissions.

It is worth mentioning that none of the positive outcomes the FPIB achieved this year would have been possible without the continued support and direction of both the Department and IAB. The relationship between the FPIB and the Department continues to grow stronger each year and the Board looks forward to working together to ensure the ongoing effective delivery of the Fire Protection Industry Permit Scheme.