



The International Association of Emergency Managers (IAEM), which has 5,000+ members in 58 countries, is a non-profit educational organization dedicated to promoting the goals of saving lives and protecting property during emergencies and disasters.

Our Vision

Our vision is that IAEM be recognized as the premier international organization of emergency management professionals.

Our Mission

Our mission is to advance the profession by promoting the principles of emergency management; to serve our members by providing information, networking and professional development opportunities; and to advance the emergency management profession.

CONSULTATION RESPONSE

Details of the Consultation

Document being consulted on:	Strategic Framework and Policy Statement on Improving the Resilience of Critical Infrastructure to Disruption from Natural Hazards
Closing date:	Noon on Monday 18 January 2010
Responses to be sent to:	naturalhazards@cabinet-office.x.gsi.gov.uk
Queries to:	Natural Hazards Team naturalhazards@cabinet-office.x.gsi.gov.uk 0207 276 5088 / 0207 276 0831

Consultation Response

Name:	IAEM - Arthur Rabjohn
Title:	President
Organisation:	International Association of Emergency Managers (IAEM)
Contact Details: (Will be used if we need to follow up any of your detailed comments. Please provide an e-mail address and telephone number if possible)	07834 065930 arthur@ccaconsultants.eu
Please state if you are content for your response to be published in the summary of responses to this consultation (delete as appropriate)	Yes – We are content for our response to be published

Question 1:

Is your organisation:

- An operator (including government department or emergency service) of national infrastructure sites or assets as defined by the CPNI.
- An organisation that represents national infrastructure operators.
- A government department that sponsors a national infrastructure sector(s).
- A regulator.

Response to Question 1:

An organisation that represents national infrastructure operators.

Question 2:

Which of the nine national infrastructure sectors does your organisation fall into, represent or sponsor?

Response to Question 2

Our membership is drawn from emergency management professional across all nine sectors.

Developing a Resilience Programme

Question 3:

Is your organisation able to support the aims of the Programme to improve the resilience of critical infrastructure?

Response to Question 3

IAEM fully supports the aims of the Programme. IAEM notes that a number of the principles the Programme is based on are within its 8 recognised Principles of Emergency Management. <http://www.iaem.com/EMPrinciples/index.htm>

Question 4:

What action have you taken since the floods in 2007 to build a level of resilience into infrastructure assets to ensure continuity during a worse case flood event? (Pitt Recommendation 52).

Response to Question 4:

Our members work across the nine sectors and the association promotes professionalism that is in keeping with the UK Resilience Programmes aims and objectives. We have disseminated all information we receive to our members in the UK and proactively keep them informed of relevant information.

We would certainly like to see the UK Government give greater statutory definition to the roles of the emergency services in flooding events. In particular the statutory roles and responsibilities of the Fire and Rescue Service need to be delivered.

Question 5:

If you own or operate infrastructure assets, how have you identified the vulnerability and risk of your assets to flooding? (Pitt Recommendation 51).

Response to Question 5:

We encourage our members to apply the Principles of Emergency Management that include:

Comprehensive – emergency managers consider and take into account all hazards, all phases, all stakeholders and all impacts relevant to disasters.

Progressive – emergency managers anticipate future disasters and take preventive and preparatory measures to build disaster-resistant and disaster-resilient communities.

Risk-driven – emergency managers use sound risk management principles (hazard identification, risk analysis, and impact analysis) in assigning priorities and resources.

Question 6:

What further guidance do you think is needed from the Government to enable the regulator within your sector (or for others where there is no regulator) to support a programme of building improved resilience? (Pitt Recommendation 53). Would you support a voluntary approach? How could this work in you sector, or what other approaches could you suggest?

Response to Question 6:

IAEM supports a clear leadership role for local government in applying the all hazards approach to risk assessment and actions to create resilient communities. The UK needs to move away from simple emergency planning and into emergency management where prevention, mitigation, preparedness, response and recovery are all part of a concerted multi-agency and multi-partnered programme.

Definitions

Question 7:

What natural hazards are most likely to have an adverse impact on the supply of essential services by your organisation/sector?

Response to Question 7:

Not applicable to IAEM.

Recent events have shown that as well as flooding this Programme should be considering Severe Weather. With climate change the hazards of wild fire, drought, heat waves etc. need to also be considered.

Question 8:

The Government has defined “critical national infrastructure”. The Pitt Review talked more generally of “critical infrastructure and essential services”. How do you define what is

<p>“critical” for the infrastructure in your organisation / sector?</p>
<p><u>Response to Question 8:</u></p> <p>Our members express concern that definition of “National Infrastructure” given at 2.6 is overly restrictive as it can be taken as referring exclusively to physical sites and systems. They preferred the definitions of “Critical National Infrastructure” given at 2.7 and 2.8 and the definitions contained within Annex A.</p>
<p><u>Standards</u></p>
<p><u>Question 9:</u></p> <p>The Government’s view is that resilience should be built into critical infrastructure to meet a minimum standard or level of expectation. What level of risk to disruption of services are your customers or the public currently expected to tolerate? How was this level determined or established?</p>
<p><u>Response to Question 9:</u></p> <p>Not applicable to IAEM.</p>
<p><u>Question 10:</u></p> <p>Are you able to support the setting of the initial interim standard for resilience to flooding as proposed? What is the resilience of the existing infrastructure in your sector/organisation compared to this standard (if known)? What further work, time and investment is needed to understand the resilience of your critical infrastructure bring it up to these standards? Will the arrangements described in this document result in appropriate and proportionate action on the ground?</p>
<p><u>Response to Question 10:</u></p> <p>IAEM believes that this document sets out a good starting point for increasing the resilience of the UK CNI. However for the Programme to be fully effective it needs to ensure all hazards planning in the form of a comprehensive emergency management becomes the standard across the UK.</p> <p>Our Emergency Services Sector members felt that a lack of guidance and clarity has resulted in an uneven picture across their sector with no consistent approach being taken or data gathered. It has therefore been difficult for them to identify their current position, or the potential work and investment needed to bring their sector up to meet any new standard. Unless these issues are addressed, it is unlikely that the proposals in this document will result in any significant improvement in their position.</p>
<p><u>Question 11:</u></p> <p>Do you agree that Government ‘standards of resilience’ to natural hazards should be based upon continuity of service standards, should be risk-based, and should vary between and/or within sectors? How does your organisation (or sector) currently adopt risk-based approaches and decide upon the level of resilience within the infrastructure and corresponding level of emergency planning/response?</p>
<p><u>Response to Question 11:</u></p>

IAEM recognises that the continuity of service is one measure of resilience and should be risk based. We also recognise that the standard can vary across the nine sectors and that certain components of the CNI carry a higher priority than others. The criticality of 'electricity supply' as far greater than 'postal services' for example.

Dependency and Interconnectivity

Question 12:

Do you agree that action is needed to improve the sharing of information to promote the understanding of resilience and dependencies across sectors? How does this currently work in practice and what further action is necessary?

Response to Question 12:

It is the feeling of our members that the place for this is a tasked Working Group of the Regional Resilience Forum so that a prioritised programme can be appropriately supported and applied. There are Regional differences that need to be taken into account. For example the 'gas supply' requirements of heavy industry are far different to those of rural areas.

The domino effect of one incident upon numerous sectors needs to be considered against the consequential impacts of the initial event. For example Flooding – Waste disposal – Drinking Water – Transportation and Security of Potable Water – Distribution of Potable Water.

Our members agree that the sharing of information across sectors is vital in improving resilience. Some felt that existing arrangements within the CCA provide a forum and mechanism for this exchange; but in their experience it has not delivered the level of improvements necessary. To deliver practical improvement, more prescriptive guidance for Local Resilience Forum's would be useful, supported by external targets and benchmarks to ensure partners actually deliver on their obligations in practice.

Question 13:

Would you support the local resilience community taking on the role of assessing dependencies and the interconnectivity of essential services in their local areas and using this to drive improvements within sectors? What arrangements would be needed to enable this to happen? Would a voluntary approach work or are changes needed to legislation or regulations (e.g. enhancements to the Civil Contingencies Act)?

Response to Question 13:

Local Resilience Forums should contribute to the process through the Local Risk Register process but the successful application of the programme in a cost effective way can only be achieved at the large scale of the Regional Resilience structure.

Under the current CCA04 structure it is difficult to see how additional legislations or regulations would be tied together under that Act. Due to the different ministerial responsibilities across the nine sectors perhaps each Ministry will need to regulate its areas of responsibilities. Audit, review and enforcement of the regulations should not lead to a raft of new regulators as the existing bodies should be made responsible for any new regulations. For example new Regulations for Water Resilience issued by DEFRA should be regulated by Ofwat.

Timetable

Question 14:

Are the timescales for the programme realistic and achievable for infrastructure owners in your sector? How does the timetable fit with the investment and funding cycles in your organisation/sector?

Response to Question 14:

Yes, but our members believe that this should be an ongoing process with the resilience requirements included into all new planning applications and new build projects. The 'public sector' should lead in this regard by undertaking that all new public buildings and infrastructure meet if not exceed current identified resilience requirements. For example the planning of new residential developments should meet a standard of resilience that ensures ground drainage and water run off drainage has sufficient capacity to prevent flash flooding.

Monitoring

Question 15:

What measures would be necessary to determine whether the resilience standard has been achieved, and how can this be monitored, reported and enforced across sectors?

Response to Question 15:

Additional responsibilities placed upon the current regulators with financial penalties for non compliance.

Question 16:

What additional arrangements would ensure that there is an appropriate overview within government of the level of resilience of critical infrastructure in your sector?

Response to Question 16:

A reporting process on all activities from the Regional Resilience Forums to a single central government Emergency Management Agency with cross Ministry representation, responsibilities and activities. The CCS with a much wider remit across all phases of emergency management.

Funding

Question 17:

Can the Government adopt the "user pays" principle to fund the building of greater resilience in critical infrastructure? What alternative options are available to fund resilience-building in your organisation/sector? Which is your preferred solution and why?

Response to Question 17:

This is not an issue that IAEM is in a position to comment on.

However some of our members raised the issue that if the 'user pays' the private companies improve their earning capability at the users expense. Private companies should not be making huge profits whilst the users foot the bill for infrastructure improvements.

One suggestion was that infrastructure providers and suppliers could be directed to fund infrastructure improvements through tax incentives.

Other Comments on the consultation paper: Strategic Framework and Policy Statement on Improving the Resilience of Critical Infrastructure to Disruption from Natural Hazards
(Please use a separate line for each detailed issue that you think needs to be addressed, adding more rows as necessary)

Paragraph number	Comments

Further comments on the consultation

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Thank you for your input into this consultation. Please attach any additional evidence that can be used to support the policy making on resilience standards for critical infrastructure.