

Dated 25 March 2009.

**Response of the Europa Council of the International Association of  
Emergency Managers (IAEM)**

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The International Association of Emergency Managers (IAEM) is a non-profit educational organisation dedicated to promoting the goals of saving lives and protecting property during emergencies and disasters.

Our Vision: IAEM shall be recognised as a premier international organisation of emergency management professionals.

Our Mission: The mission of IAEM is to serve its members by providing information, networking and professional opportunities, and to advance the emergency management profession.

The following is the view of the IAEM on the '**National Flood Emergency Framework Proposals for consultation, published in December 2008**', and what wish to see from a '**National Flood Emergency Framework**'.

We acknowledge and agree that the purpose of a National Flood Emergency Framework, as set out in the July 2008 published outline, is to provide a forward looking policy framework for flood emergency planning and response. That the National Flood Emergency Framework must not be a document that simply encapsulates existing provisions. It must add value to the current arrangements by helping to ensure that planning at local, regional and national level is up-to-date, clear and precise on roles and responsibilities. It should provide a common and strategic reference point for flood planning and response for all tiers of government and for all responder organisations whether they are governmental or non-governmental organisations.

We applaud the consultation with actors and stakeholders which will help validate those objectives and to narrow down more precisely what those who are charged with on-the-ground emergency planning and response actually need. It must establish ownership of the plans for activation when the floods arrive next as that part of the process is in itself invaluable.

In respect of the '**Territorial extent**' of the consultation and to take forward this work we note 'Defra' intends to liaise closely with the devolved administrations. This must be carefully coordinated, as must the resultant plans, as we observe that major area wide floods have the power to impose their '**Four Realities**' upon responders and communities alike, which will test any plans to the limits because:

- Floods by their very nature are multi-jurisdictional events.
- Floods by their very nature are multi-agency events.

- Floods by their very nature are Haz-Mat and public health events.
- Floods by their very nature are long term events that can exhaust emergency personnel and community members emotionally, mentally, and physically.

The consultation document makes recommendations in six key work streams that need to be developed and form the basis of the proposals, therefore the IAEM's comments on them are set out as follows (in the format of the document):

## **CONSULTATION QUESTIONS**

**1. Do you agree that the approach outlined above (resulting in more bespoke, local advice on possible and actual flooding) would help emergency responders and planners to make good decisions on when to activate emergency plans, and escalate or de-escalate their response?**

**2. What are the risks or potential issues for you or your organisation?**

**3. How might the Environment Agency improve the effectiveness of public information on flood warnings leading up to an incident?**

**IAEM comments:** Improvements in warnings provided for the public and professional partnerships should make a significant contribution to resilience and the effectiveness of future flood responses and decision making processes.

All actors should be engaged with the new Flood Warning Centre to assist in the development of the bespoke information and warning systems that would be needed to respond to future events.

For emergency managers the issues will be to consider with the Flood Warning Centre the levels of certainty required in any warning system. This will require greater knowledge and understanding by end users about the probabilistic nature of the models used to enable realistic trigger levels to be set by the Warning Centre. This will underpin confidence levels in the system and balance against the consequences of false alarms becoming too frequent and undermining that confidence. But this should also be factored against the potential consequences of not giving sufficient early warning for events such as a North Sea flood surge even if the probability was low. That is to say the risk factors have to be balanced with the severity of consequences. In respect of the day to day heavy rainfall events greater accuracy and certainty may be required before invoking a warning to responders.

**4. Do you agree that the division of responsibilities outlined in the Annex is the right one to ensure that planning for and responding to flood emergencies is effective and comprehensive?**

**5. Are there things missing, or bigger gaps which need to be filled?**

**6. If so, who should fill those gaps and how?**

Currently emphasis is placed on LRF structures to assess local risks and make plans accordingly, but this statutory requirement under the 'CCA' does not in itself establish clarity and certainty in respect of the role and responsibilities of the various responder agencies. There seems to be the potential for even greater confusion for the public than exists already, if agencies enact different decisions about responsibilities in differing LRF areas of responsibilities.

Clearer definition is required with regards to the 'preventative' aspects of emergency management with regards to flooding and which organisations have responsibilities in this phase. Local Authorities must be given clearer direction to act upon their powers with regard to planning permission in identified flood risk areas.

Legislative clarity is needed around the responsibilities for coordinating and responding for specialist flood rescues. Until this issue is resolved, there is considerable scope for ongoing confusion and prevarication about who is responsible for what. Not a situation that is needed when lives are at risk or when budgets are under pressure. It needs to be made clear that the Fire and Rescue Service are the primary water rescue agencies and all others support them. This will allow consistency and the development of safe inner cordon protocols.

**7. Do you agree that the new and planned arrangements referred to above will provide what emergency responders, and those whose health and/or social care may be affected by flooding, actually need?**

With the caveats expressed within these comments we support the recommendations made.

**8. How valuable is the preliminary flood planning guidance and how might it be improved?**

**9. What further guidance or assistance do LRFs need to complete work on updating and improving their flood plans?**

**10. Do you agree that there is a need for more formal guidance and advice on emergency planning for flood events that extend beyond the local level?**

**11. From your perspective, what are the key factors for effective planning for the consequences of dam breach/ reservoir inundation?**

Whilst we would support the recommendations in principle, in order to make progress for the safety of our communities. However, we would say that whilst it

is right for LRF's to formulate plans differently, according to their own local circumstances and risk assessments, there is the possibility that without a framework within which to work, major events will not be managed effectively. For example, local flood plans considered in isolation may assume access to the same mutual aid resources as neighbouring areas; these may or may not be sufficient to meet the needs of multiple authorities.

Equally, if plans have no consistency in terms of approach and roles and responsibilities, coordination of mutual aid will be impossible to manage effectively.

As we have stated above, 'Floods by their very nature are multi-jurisdictional events' and 'Floods by their very nature are multi-agency events' a common framework is therefore vital.

For the same reasons whilst we would agree that flood emergency planning must take place at a higher than LRF level, regional government structures do not currently provide a suitable forum for this work as floods very often cross regional borders. e.g. in November 2007 the North Sea storm surge impacted Lincolnshire in East Midlands, and Norfolk in East of England.

**12. Will the newly developed guidance for local authorities lead to increased and improved mutual aid arrangements between local authorities?**

**13. If not, what is needed to make this happen?**

**14. What role should LRF's and RRF's play in developing and calling upon mutual aid arrangements in the event of a flooding emergency in their area?**

**15. What sort of mutual aid arrangements do we need to ensure the deployment of suitable equipment and trained people from multiple agencies in the event of an urgent need to rescue people from flood waters?**

**16. Do you agree that we should invest in developing and maintaining a new electronic, aggregated, accessible and easily updatable compendium of information, advice and guidance owned and maintained collectively by central departments and agencies?**

Whilst we would welcome any guidance that both increases and improves mutual aid arrangements between local authorities, we doubt that this may be possible without a greater understanding of what might be required, where it might come from, and the costs involved.

The system which is known as 'Team Typing' could become a great aid in assisting all responders facilitating recognition and deployment of resources and therefore we would strongly urge the development of resource typing categorisations to especially assist local authorities in their mutual aid pre-planning. This would follow the proposals made by the Chief Fire Officers Association and accepted by the government in respect of rescue resources. To work this through for local government goods and services would be to enable them to identify what might be required, after setting a standardised description, and including any practical details and costs. So for example if a water tanker was required, a local authority could send out a request for a full 'drinking' water tanker and avoid the possibility of an empty one or washing only one arriving, thus avoiding a potentially dreadful situation for a community expecting essential water supplies but not receiving the life sustaining water.

The IAEM continues to support the vision for flood rescue put forward by Sir Michael Pitt that, "The Government should urgently put in place a fully funded national capability for flood rescue, with Fire and Rescue Authorities playing a leading role, underpinned, as necessary, by a statutory duty."

The IAEM remains disappointed that the government's response to the Pitt review falls short of this commitment.

However, it is appreciated that the proposed 'enhancement programme' currently understood to be underway will be making an interim investment in flood rescue capabilities. But again we must sound a note of concern that unless Sir Michael Pitt's recommendations are implemented in respect of long term and sustainable funding, supported by statutory clarity and certainty, the enhancement programme will not have the required reach and effectiveness, thus potentially placing communities at risk.

IAEM  
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