

Submission: Inquiry launched into 2026 summer fires across Victoria

About the College

The Australasian College of Paramedicine (the College) is the peak professional body representing and supporting paramedics across Australasia. We champion the role of paramedics in emergency, urgent and primary care, driving a connected, multidisciplinary approach to high-quality healthcare in all communities.

The College is future-focused and committed to enhancing person-centred care through sustainable, evidence-based approaches and holistic workforce initiatives that see paramedics valued and utilised across the healthcare system for their unique capabilities.

With our reach across Australasian jurisdictions, practice contexts and employment relationships, the College is uniquely positioned to lead and advocate for the role of paramedics across the broader healthcare system to ensure they work to their full scope of practice.

Introduction

The College welcomes the opportunity to provide input to the *Inquiry into the 2026 summer fires across Victoria*. We commend the Victorian Government's commitment to strengthening preparedness, coordination and response capability across government, emergency services and communities ahead of future fire seasons.

This submission outlines the impacts of regulatory limitations within the *Drugs, Poisons and Controlled Substances Regulations 2017* on responding paramedics during the 2026 bushfire season, and provides recommendations informed by feedback and lived experience of the College's membership.

Our position

The College acknowledges and supports the licensing of private paramedicine providers by the Victorian Department of Health,^{1,2} which played a critical role in supporting fire agencies during the 2026 Victorian summer bushfires.

During the 2026 bushfires, Ambulance Victoria was unable to meet requests for healthcare support across firegrounds, staging areas, base camps, and community relief centres. As a result, these responsibilities were largely undertaken by licensed private paramedicine providers (on firegrounds) and licensed first aid agencies (within relief centres).³

While the use of private providers appropriately supported and protected Ambulance Victoria's core operational capacity, it also exposed critical regulatory limitations affecting paramedics working in these environments.

The current *Drugs, Poisons and Controlled Substances Regulations 2017* do not adequately recognise paramedics working outside of Ambulance Victoria.⁴ As a result, paramedics employed by licensed private providers are unable to access or administer medicines, which are often clinically required in the context of bushfire response (e.g. for acute pain management in traumatic or burn-related injuries). This creates unnecessary barriers to timely and appropriate patient care in high-risk and remote environments.

The College strongly supports reform to explicitly include paramedics within the regulatory framework across broader health service settings.

The College's position is that paramedics should be provided with permissions equivalent to those of registered nurses⁵ under the regulations, where they are practising within their scope, competence, and under appropriate clinical governance and credentialing arrangements. While paramedics and nurses have distinct professional training and roles, both are Ahpra-registered professions, subject to national standards, and accountable for safe and ethical practice.⁶

Maintaining a regulatory distinction between these professions in relation to the possession and administration of scheduled medicines is not supported by contemporary practice. It introduces unnecessary ambiguity, creates avoidable barriers to care, and imposes additional regulatory burden across the health system.⁷

Reform in this area is both necessary and overdue, and would ensure that the regulatory framework aligns with current models of care, supports effective emergency response, and enables paramedics to contribute fully and safely across the health system.

Recommendation

To support effective health service preparedness and delivery during emergency management the College recommends that the Victorian Government amend the *Drugs, Poisons and Controlled Substances Regulations 2017* to explicitly include paramedics across all approved healthcare settings, with regulatory parity to registered nurses, enabling them to possess, supply and administer scheduled medicines within their scope of practice and under appropriate clinical governance and credentialing arrangements.

Conclusion

The 2026 Victorian summer bushfires exposed critical regulation barriers in Victoria's emergency health response. While the contribution of licensed private paramedicine providers was essential in supporting fireground operations and protecting Ambulance Victoria's capacity, these arrangements were constrained by outdated and inconsistent regulation governing paramedic practice.

Paramedics are an Ahpra-registered, highly capable workforce, already operating safely across complex and dynamic environments. This is not a workforce limitation - it reflects a gap in current policy regulatory settings.

Without reform, these barriers will continue to compromise the effectiveness of emergency response, limit access to timely care, and place unnecessary strain on Ambulance Victoria and the

broader health system.

The College calls on the Victorian Government to act decisively to modernise the *Drugs, Poisons and Controlled Substances Regulations 2017* and ensure paramedics are enabled to practise to their full scope across all approved healthcare settings. This reform is essential to building a resilient, flexible, and future-ready health system, one that can respond effectively to increasingly frequent and complex emergency events.

References

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