



16th June 2020

Parliamentarians & Hon Members of Parliament
Parliament House
Spring Street
EAST MELBOURNE VIC 3002

Dear Parliamentarian,

Re: POLICE AND EMERGENCY LEGISLATION AMENDMENT BILL 2020

I am writing to request that you please do not vote or support Part 6 – Schedule 2 of the proposed Police and Emergency Legislation Amendment Bill 2020 which was introduced into the Legislative Assembly on the 2nd June 2020, and due to be debated in the Legislative Assembly tomorrow 17th June 2020.

Volunteer Fire Brigades Victoria do not support these amendments and stand in full support and solidarity with the Trafalgar and Westbury Volunteer Fire Brigades in their opposition to the proposed amendments to their primary areas.

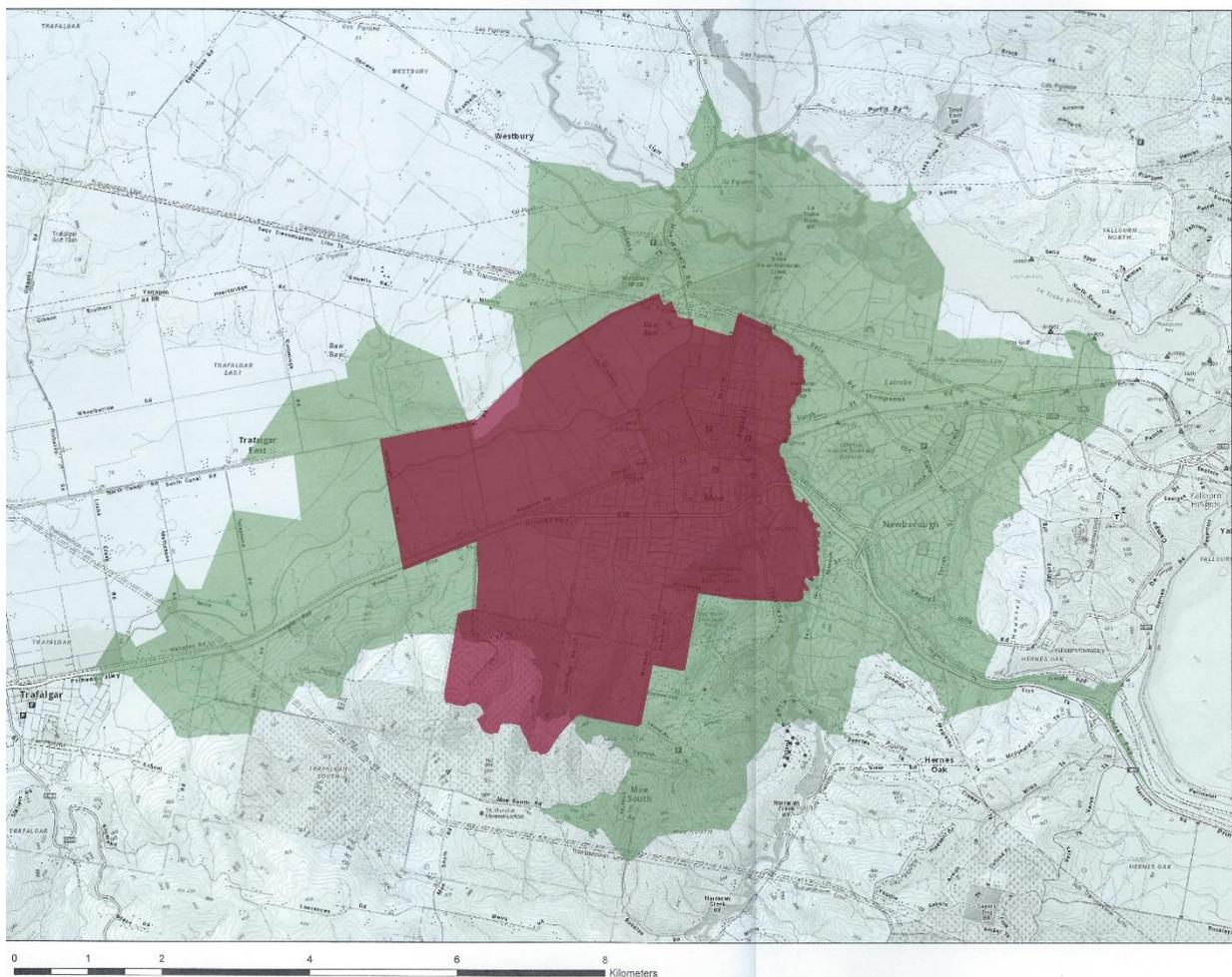
Disappointingly, the State Government has rejected all proposals and compromises sought for amendment of the Latrobe West proposed FRV boundary put forward in good faith by VFBV and CFA.

Our concerns are as follows:

1. When the government submitted and passed its Fire Services (Reform) Legislation on the 20th June 2019 it lodged its Fire Rescue Victoria District maps with the central plan office reference LEGL/17-371. These consisted of 36 maps covering 35 CFA locations to be annexed from the Country Area of Victoria and transferred to Fire Rescue Victoria.
2. At the 11th hour, and just 30 days prior to the 1st July go live date of its reforms, the government has lodged updated maps containing 41 maps covering 38 CFA locations now to be annexed from the Country Area of Victoria with reference LEGL/20-011.
3. The government committed to a clearly defined process for the future modification of FRV boundaries, set out in its legislation (Firefighter' Presumptive Rights Compensation and Fire Services Legislation Amendment (Reform) Act 2019) by use of a Fire District Review Panel process (section 61 of its Amendment Bill). It also constantly remarked that one of the primary reasons for its changes we to put more rigour and risk analysis in future boundaries changes.
4. It is VFBV's position that the government has not followed the process set down by statute to make modification to these additional boundaries.
5. VFBV asserts that any attempt to pre-empt these legislative changes by administrative process or action would similarly be ultra vires.

6. We further add that modifications proposed to Map 16 (Latrobe West) in particular, represents a significant change, not supported by VFBV.
7. Map 16 details a FRV District Boundary solely drawn and based on Road network modelling, and draws a boundary of 8 minutes for the FRV station – significantly expanding on the primary area of the CFA brigade in which it replaces.
8. Due to very poor local engagement and consultation, there has been no opportunity for brigades to provide local knowledge or input into the development of the proposed boundary. This lack of local knowledge and risk assessment is considered a serious flaw in the development of a brigade primary boundary. Assumptions have been made in the road modelling about local road capacity, weight limits and the existence of bridges which local knowledge refutes and believes to be inaccurate.
9. The below image has been produced by VFBV to graphically demonstrate the expansion of area proposed to be transferred to FRV. This map has been produced internally by us for illustrative purposes only. The red area represents the current CFA primary area that is currently in use, with the green area showing the impact of the expanded area proposed to be transferred.

LATROBE WEST



10. VFBV points out that neither CFA or FRV have even purchased the proposed land for where the future FRV station will be located and has based the proposed boundary on a temporary location.
11. Contrary to the government's commitment that its reform legislation would not impact on volunteer brigades outside current CFA integrated brigade areas, the proposed changes to the Latrobe West boundary directly impacts on 4 additional fully volunteer brigades.

12. VFBV asserts that no risk assessment, modelling or data analysis has been shared with VFBV or the local brigades to justify the proposed changes or explain the revised area. No other CFA boundaries have ever been drawn based solely on road network modelling, and this represents a radical departure from current practice.
13. Only considering a response boundary based solely on road network modelling and an eight-minute response is seriously flawed and counter to external reports and findings on the appropriateness of relying solely on time-based response measures. In March 2015, the Victorian Auditor-General completed his audit of Emergency Service Response Times and concluded:

“Targets for the number of minutes to arrive are outdated or not based on evidence. Measures are often narrowly defined and exclude significant proportions of emergency response activity. Data quality is not assured in a number of instances, and Victoria Police does not measure its response times at all.” P vii, Victorian Auditor-General’s Report – Emergency Service Response Times.
14. Primary boundaries use geographic landmarks and topography for ease of identification of emergency services personnel. Any review of all the other maps submitted to the central plan office (LEGL/20-011) clearly demonstrate the straight lines and logical partition of geographic areas in all other primary areas. The Latrobe West boundary represents a radical departure from this process with no clear explanation or risk assessment as to its appropriateness.
15. The proposed boundary expands the FRV District across two CFA District Boundaries and straddles the District 27 and District 9 boundaries. This is inconsistent with CFA protocol that boundaries align to local government boundaries and will create administrative problems and inconsistency.
16. VFBV submits that the proposed vehicle typology and crew mix for the career only FRV Latrobe West location is inappropriate for large sections of the rural interface area encompassed in the proposed boundary, and is contrary to all current fire service risk modelling and response planning. For example, within the Trafalgar East area proposed to be annexed from the Country Area of Victoria we are informed that 51 residential properties are located within 150 meters of significant vegetation, and listed on the Victorian Fire Risk Register with a bushfire risk rating of Extreme or Very High. These areas will rely on significant volunteer surge capacity from neighbouring brigades, and this capacity should not be put at risk.
17. VFBV fully supports and endorses the concerns raised by Trafalgar Fire Brigade and Westbury Fire Brigade. We urge you to familiarise yourself with the concerns documented by both Trafalgar and Westbury. VFBV further supports the wishes of Newborough and Moe South Brigades who are located within the District 27 footprint and do not wish to oppose the changes made to their areas.
18. Trafalgar and Westbury Fire Brigades have both indicated formally to VFBV that the proposed changes will have a significant impact on the morale of their volunteer’s and presents a significant risk to their future brigade sustainability and volunteer surge capacity.
19. There is no community benefit to these changes. All brigades are supportive of the Latrobe West career staff response area remaining unchanged for response purposes and computer aided dispatch. There is no benefit to the career staff of an expanded primary area. However, there is significant impact on the reduction of primary area for the Trafalgar and Westbury Fire brigades.
20. The proposed changes represent a significant impact to these two brigades. Both of these brigades have exceptional records of service to their communities, and both are recording a 100% Service Delivery Standard result.
21. VFBV is highly concerned at the message this proposal sends to all volunteer brigades in the lead up to the new boundary review panel process. Both brigades have established an impressive SDS record, with both achieving 100% SDS this year. The message that despite a brigade fully achieving current

performance standards (exceeding even that of many career only stations) having no bearing on proposed boundary changes will send a chill down the spines of every volunteer brigade in the state, and makes a mockery of the government's promise of evidence and risk based boundary review processes. This will be viewed by volunteers as a significant betrayal and broken promise.

22. In many areas proposed for transfer to FRV, the CFA volunteer brigade is closer and able to respond in a more timely manner. In many areas proposed to be transferred to FRV the volunteer brigades' tankers are the more appropriate fire appliance due to the lack of reticulated water.
23. Both Trafalgar and Westbury Fire Brigades contain significant local knowledge and relationships in their own communities that aid their emergency response to emergencies arising in their local communities.

It is my belief that the government is deeply underestimating the impact of its proposal on the future morale and sustainability of community embedded local fire brigades.

Community members join their local brigade to help support their local community. It is this connection with their local community that drives their passion and commitment and helps mitigate the negative impacts of the significant sacrifices that CFA volunteers make, both to their time and work/life balance.

These volunteers have developed a relationship with the local community as their primary provider for decades, sometimes reaching back over more than 100 years. This connection and responsibility is what motivates volunteers to continue making ever increasing sacrifices and builds crucial community resilience. Decisions that start to chip away at these primary motivators put the volunteer model at serious risk.

This does not mean career staff have no empathy with their primary brigade patch – but it is different and sits differently in their list of primary motivations. They are in paid employment and are for the most part required to work where required. Therefore, their employment is their primary motive not the brigade primary area. Therefore, lines on a map have very little impact on the primary motivation for career staff.

For volunteers, their primary area is their connection and responsibility to their local community and the source of pride and responsibility. Changing their role from primary to support only, will have a significant impact and will also result in fracturing their small community as responsibilities get split up.

Human nature is if you take away someone's primary motivation to do something - this has a significant impact on their future. If they do not feel they have an important role and ability to make a difference they will find other endeavours in their local communities where they can make such a difference. And CFA and the Victorian Fire Services will be much the poorer without them.

I want to re-iterate that this is not a volunteer vs career staff issue. There are terrific relationships between the career staff operating out of Latrobe West and the surrounding volunteer brigades. In fact, our point is these relationships and mutual respect has been built on the current primary areas and the response model that all the local brigades have agreed, but which the governments amendments are seeking to change.

I would be happy to provide you any further information, background or briefing should you desire it, and would welcome any opportunity to engage with you on this or other matters. May I please request you do not support Part 6 – Schedule 2 of the Police and Emergency Legislation Amendment Bill 2020.

Sincerely,



Adam Barnett
Chief Executive Officer