Dear Select Committee Members,

I am a CFA Volunteer Firefighter of 13 years, having been a member at integrated and volunteer brigades, and I write against the proposed restructure of the fire services.

The first point I would ask you to question goes to the underlying rationale - why the sudden impetus for change? The most recent report, The 2015 Report of the Fire Services Review (FSR), commissioned by the current Government, states that:

"CFA could also strengthen its integrated brigade model by developing a planning and implementation process for integration that draws on the successes of existing integrated brigades and provides ongoing support. More deftly managed integration would strengthen the overall relationship between paid and volunteer firefighters and preserve the vital surge capacity that volunteers provide and upon which the state relies."

Further to this, none of the previous reports cited by the Minister as reason for change suggest splitting of the service. What has occurred in the last 12 months to suggest that the CFA model is so irreparably damaged that it would require the wholesale dismantling of the service? Especially considering the 2015 Fire Services Review report actually recommended strengthening these very structures, and the 2009 Bushfires Royal Commission stated that "...the Commission considers the CFA integrated service delivery should be maintained as a viable model". It may be cynical but this sudden need to implement sweeping changes to the fire service seems to coincide with the perceived inability for the Enterprise Bargaining Agreement, in its current form, to pass Fair Work Australia due to changes in Federal law; perceived because it has not been put to FWA to be tested. Surely such dramatic changes that impact all Victorians should be based on more than an industrial dispute?

The justification coming from media campaigns funded by the United Firefighters Union, and as argued by the Government, is that the CFA integrated structure is based on a 1940's model and is therefore outdated. If this is so, we must also question the structure of our military, which has been around since the end of the Middle Ages. Aside from that, integration gives the community the best combination of guaranteed response at all times from our career firefighters, and the ability to provide frontline capacity, management and support during small, medium, large or extended events by our volunteers. Events like storms; structure fires such as the 2011 TriTech Lubricants fire in Dandenong or the 2006 mattress factory fire in Moorabbin; response and step-up capability for fires like the Broadmeadows tyre yard fire; interstate deployment to assist South Australia after the Pinery fire in 2015, or the Tasmanian floods in 2016; and importantly surge capacity for extended campaign fires like the Hazelwood Mine fire, 2006 Alpine fires and of course the devastating Black Saturday fires. Coupled with the ability to respond to multiple local calls without diminishing response, or the need for dozens of paid firefighters on standby, the integrated model ensures excellent community service and safety. All this will be lost with the demise of integrated brigades, and the potential loss of viable volunteer stations in areas that become Fire Rescue Victoria (FRV) zones in future. This doesn't build capacity, rather diminishing it and the ability to respond to any type of emergency in any part of the State – urban, interface or rural.

The next policy rationale claimed is the perceived quality of response. Assertions are being made that CFA career staff and volunteers do not provide an adequate or modern service to communities in urban areas; that you are somehow less safe in a CFA area. Although, when you look at the details, these claims are not backed up with supporting data. If there were overwhelming evidence that

integrated or volunteer CFA brigades aren't meeting community service standards, and therefore must undergo this momentous change, it has not been forthcoming.

Improvements can, and have been, made by continually reviewing and evolving our strategies, but not necessarily weakening our structures. Again, recommendations from multiple inquiries suggest strategic – not structural – change to further improve the service. The CFA is a modern fire service, and there has been no empirical evidence presented to suggest otherwise.

The impact to fire service delivery is difficult to scrutinise as no real detail into how the changes will improve the fire service has been given, and what information has been presented is conflicting. The Government has stated that there will be no change to operations, and volunteers will not be impacted. However, the CFA Chief Fire Officer has stated there will be significant changes for volunteer firefighters at integrated stations. All of the CFA stations identified to become FRV stations are integrated and already have a 24/7 staff response, just the same as MFB areas, plus the benefit of volunteer firefighters as well. If anything, these areas are better served than MFB areas – changing the structure would be going backwards for these communities.

Without details or supporting documentation on how this will be implemented, how the changes will improve service delivery or how it is cost effective, it is unclear how the mooted changes actually improve or 'modernise' anything. It is important to note that volunteer firefighters make up a significant portion of the international firefighting cohort – according to the National Fire Protection Association, 70% of all firefighters in the United States are volunteer, generally protecting communities of up to 25,000. Volunteer firefighters are a big part of a modern fire service.

The assessment of volunteer retention seems highly optimistic at best. No details or plans have been presented on how CFA volunteer firefighters will operate out of FRV stations, and this raises some significant questions. The obvious being – how? It is fair to assume the area will be the responsibility of FRV, as you would expect, so what would the CFA brigade in the same location actually do? It seems a fairly simple and important question, yet is unanswered. Modelling prepared by The University of Melbourne's Centre for Disaster Management and Public Safety found that 30% of Victoria's 'surge capacity' – our ability to mobilise a large response force at short notice – comes from the outer metropolitan area; the very areas that will become FRV staff only. There is a fair expectation that the corridors from the current MFB boundary to these islands will inevitably become FRV areas, eliminating CFA brigades in between. That will have a serious impact on our ability to mobilise thousands of personnel in response to escalating emergencies, and still provide local coverage.

With regard to the Metropolitan Fire District, the 2009 Bushfires Royal Commission found that:

"It (CFA) has met this demand by maintaining integrated stations of career and volunteer firefighters and using urban firefighting vehicles and equipment. Continued urban growth does not necessarily mean that the MFB ought to be responsible for emergency response in those areas. But the fact that the metropolitan fire district does not reflect metropolitan Melbourne is incongruous—increasingly so with continuing demographic changes and urban growth. The State expressed concern that, because of the MFB's funding model, the cost of expansion of the metropolitan fire district would be passed on to ratepayers in the newly assigned areas. In addition, expansion of the metropolitan fire district boundary would probably decrease the critical surge capacity of the CFA through a reduction in the number of volunteers available to deploy elsewhere in the state"

The report goes on to assess boundary changes, finding that:

"The State noted that if the boundary were extended there would be fewer CFA integrated stations and a reduced CFA surge capacity. If the existing model can deliver the service the community expects and continues to deliver it, this provides social capital for local communities and a depth of operational capacity.

Volunteer engagement and participation will inevitably reduce in the decommissioned integrated stations; if their time and skills are not being utilised in a meaningful way, they will move on. That loss of trained and experienced firefighters will surely have a tangible impact on the overall safety of the Victorian community. We know that the CFA is not here for the sake of volunteer firefighters; however the State cannot afford to lose those volunteers, their skills and the capacity they bring to emergency response.

With regard to costings, again, little information has been forthcoming although some rough estimates can be made; I understand that the EBA outlines base pay, and we can assume that appliances will be staffed as per the proposed EBA and not stations. If we assume 1 Station Officer, 1 Leading Firefighter and 2 Qualified Firefighters per appliance, over four shifts, and based upon the pay rates for May 2017 in the EBA (revision 17) Clause 145, it will cost roughly \$27,769.56 to staff one appliance per week, excluding allowances and overtime, or \$1,444,017.12 per annum. If we assume a minimum of one extra appliance per (currently integrated) station to offset appliances that remain with the CFA, we are looking at \$50,540,599 per year to staff just one appliance across 35 stations. This excludes Operations Officers, Senior Station Officers, allowances and overtime – the changes would be a minimum 200% increase in costs to the community. If anything, it is simply unaffordable to dismantle an effective, efficient and flexible system under the guise of it somehow being more modern, or improving community safety. Neither of these claims are supported by any evidence, and no explanation is provided as to how it is actually modernising or improving community safety. If anything, it reverts the model to a pre-1945 state. The only thing we are certain of is the increased structural costs to the community, which will only ever go up.

Victoria is one of the most fire prone areas in the world. The CFA model works, and ensures we can respond to any emergency that arises, whilst meeting service standards, community expectations, and is affordable to the State. If there is consternation that some areas covered by the *Country* Fire Authority are not necessarily 'country', then let's change the name. For such a momentous change to occur, one would expect an overwhelming amount of data pointing towards flagging standards. Reviews would not say "strengthen the current model", and proponents would easily clarify and present supporting evidence of how the changes will be implemented, how it will be better than the current model, why it will be safer and how much it will cost – before putting it to the vote. None of this has happened. Have any alternatives been tested or assessed before deciding this is the only course of action available –if they were deemed ineffective, why? And if this is inevitable, there surely needs to be more than a vague objective devoid of costings, some platitudes and an attitude of just 'winging it' and hoping for the best. Restructuring the fire services in this State, and the consequences of doing so, is far too important to just leave to chance.

Regards,

Marc Burton-Walter