



Parliamentary Inquiry into the 2026 summer fires across Victoria

SUPPLEMENTARY DOCUMENT TABLED AT PUBLIC HEARING:

UFU RESPONSE TO VFBV SUBMISSION

Melbourne, 1 May 2026

1.1 Introduction of s 6F of the County Fire Authority Act 1958 (the CFA Act) in 2019: CFA a “fully volunteer firefighting service”

1. The Volunteer Fire Brigades Victoria (VFBV) submission to this Inquiry includes a detailed section relating to the Secondment to CFA program.¹ This section of the VFBV's submissions is clearly outside the scope of the Inquiry's Terms of Reference and should not be given further consideration. If the committee is minded to consider the VFBV's submissions on this topic, then it should also consider the following submissions in response.
2. As part of Fire Services Reform, and following years of requests by volunteers for a volunteer Country Fire Authority, on 20 June 2019 the Victorian Parliament passed amendments to the CFA Act to recognise the CFA as a “volunteer-based organisation”.² The CFA Act now recognises that the CFA is a “fully volunteer firefighting service”.³
3. Whilst the base of the CFA is fully-volunteer, of which we support, professionals that are employed by Fire Rescue Victoria are seconded to CFA to undertake several roles including:
 - (a) Instructors (CFA Volunteer Training);
 - (b) Practical Area Drill Operators/Supervisors (CFA Volunteer Training);
 - (c) Commanders (senior operational firefighters); and
 - (d) Assistant Chief Fire Officers (senior operational firefighters) (ACFOs)
4. Importantly, each of the above roles were fulfilled by career staff prior to the introduction of Fire Rescue Victoria. That is, there has been no change to the roles provided to the CFA and to CFA Volunteers and the broader Victorian community.

¹ See pages 26 – 35 of the Volunteer Fire Brigades Victoria submission dated 19 April 2026.

² Victorian Parliament, *Firefighters' Presumptive Rights Compensation and Fire Services Legislation Amendment (Reform) Act 2019 (Vic)*, No 20/2019, s 1(c)(ii).

³ CFA Act, s 6F, which provides “The Parliament recognises that the Authority is a fully volunteer fire fighting service under the command and control of a paid Chief Officer and supported where necessary by other paid staff. The Parliament recognises that this does not preclude the Authority from employing paid staff in the role of Chief Officer, Deputy Chief Officer and Chief Executive Officer or from entering into a secondment agreement (within the meaning of section 25C(10) of the Fire Rescue Victoria Act 1958).”

1.2 Qualified and experienced Command personnel (Commanders & ACFOs)

5. The VFBV submission makes several assertions regarding the background, experience or skills of seconded Commanders and ACFOs that are unsupported by evidence. Importantly, many of the individuals the subject of these comments are, or have been, CFA volunteers in their personal capacity and were once CFA employees. In the absence of substantiating evidence, these VFBV submissions ought be afforded no weight.
6. For example, at page 27 of their submission, the VFBV state that:
 - (a) “Volunteers have continued to report that the lack of suitably qualified and experienced CFA Command personnel seriously impacted CFA response to the 2026 bushfires”; and that
 - (b) an issue includes the “long-term cultural issues associated with command staff being loaned from another organisation that has no background or experience with volunteers”.
7. Again, the above VFBV submissions fail to provide any statistical evidence to support the above statements.
8. Data currently held by the fire agencies demonstrates that **66.2% of all command staff seconded to CFA are former CFA employees**. The breakdown of this figure is as follows:
 - (a) **84.4%** of ACFO roles are filled by personnel employed by CFA prior to fire services reform;
 - (b) **87.5%** of ACFO Regional Controller roles (a role that was delivered as a result of the 2009 Bushfires Royal Commission) are filled by personnel employed by CFA prior to fire services reform;
 - (c) **100%** of ACFO Managers Community Safety roles are filled by personnel employed by CFA prior to fire services reform; and
 - (d) **56%** of Commander roles are filled by personnel employed by CFA prior to fire services reform.
9. It is noted that the CFA has employed an individual without a fire service background, specifically a paramedic officer, to fill the senior Fire Command position of CFA Deputy Chief Officer. We note, with disappointment, that no comment was made of this in the VFBV submission.

1.3 FRV’s legislative requirement to provide career staff and vacancy management

10. All workers in Victoria and, indeed, Australia are entitled to various leave provisions by their respective employers. In the case of FRV Firefighters, there is no difference in their leave arrangements today than prior to Fire Services Reform.
11. At page 30 of the VFBV submission, the VFBV sets out the number of seconded personnel that FRV is obliged to provide to CFA. The figures cited by VFBV are out of date. The number of seconded personnel required for Commander and ACFO roles has since increased:

- (a) the VFBV submission states that 45 ACFO roles must be filled by FRV. **The correct number is 50.**
- (b) the VFBV submission states that 96 Commander roles must be filled by FRV. **The correct number is 107.**

12. With respect to Commander positions (noting that, per the above, *more* positions are now required to be filled), the data held by the fire agencies demonstrate a concerted effort in reducing vacancies since fire services reform, as follows:

Timestamp	Statistic
19 March 2020 (CFA: Pre fire service reform)	19 CFA Commander vacancies. 8 of these 19 were classed as Long-Term Vacancies (LTVs) that had been vacant and unrelieved for periods between 3 months and 2 years.
12 August 2020 (1 month post reform)	16 FRV Seconded Commander vacancies. Less than 2 months into FRV, there was a lot of movement of FRV personnel.
15 October 2020 (3 months post reform)	8 FRV Seconded Commander vacancies.
30 June 2022 (2 years post reform)	1 FRV Seconded Commander vacancy. Two years into FRV, the purposely-established FRV Secondment Department was working to reduce vacancies – not in recent history had CFA Volunteer Catchments/Districts been so well-resourced with senior operational personnel.
31 December 2022 (2.5 years post reform)	4 FRV Seconded Commander vacancies. These positions are out to Lateral Entry to fill.
August 2023 (3 years post reform)	4 FRV Seconded Commander vacancies (D7, D14, D10, D17) These positions are currently being advertised for promotion and, according to the Secondment Department, “are expected to be filled easily”.

- 13. The above table was presented by UFU to the Hon Niall Blair, Fire Service Implementation Monitor on or around 20 September 2023.
- 14. At page 31 of the VFBV submission, reference is made to a “significant and critical shortage of required capability in CFA’s senior operational leadership”. The source of this data is unknown.
- 15. Data held by the fire agencies for the week commencing 5 January 2026 is different to that cited in the VFBV submission at page 31:
 - (a) The VFBV submission states that there were 11 vacant/unrelieved ACFO positions across the state. **The correct number is 4.**
 - (b) The VFBV submission states that there were 34 vacant/unrelieved Commander positions across the state. **The correct number is 25.**

16. Additional data held by the fire agencies for the entire period in question in this Inquiry are also depicted by the following table:

Week commencing	Weekly: Percentage of seconded positions filled in that week	Monthly percentage of seconded positions filled in that week	Quarterly percentage of seconded positions filled in that week
29/12/2026	87.9%		
05/01/2026	87.9%	89%	90.5%
12/01/2026	89.5%		
19/01/2026	90.8%		
26/01/2026	92.9%		
02/02/2026	95%	92.1%	90.7%
09/02/2026	94.6%		
16/02/2026	94.1%		
23/02/2026	95%		
02/03/2026	94.6%	94.6%	91.9%
09/03/2026	93.7%		
16/03/2026	91.6%		
23/03/2026	88.3%		
20/04/2026 (last week)	92%	89.3%	92%

17. At page 30 of the VFBV submission, it states “the legislation provides CFA with no mechanism to fill unfilled or vacant positions”. This is misleading.

1.3.1 CFA holds the ultimate power in relation to relief/personnel

18. The Secondment Agreement, provided for under s 25C of the *Fire Rescue Victoria Act 1958* (the **FRV Act**), provides the CFA with the sole power to request relief and personnel. It also provides the CFA with the sole power to agree to or reject particular relief and/or personnel. The status is as follows:

- (a) The Secondment Agreement states that relief requests should be made by CFA to FRV with at least 42 days’ notice prior to the unrelieved period commencing.
- (b) Presently, for positions which could be covered by Higher Duties arrangements, CFA provide FRV with a median notification period of 26 days.
- (c) Presently, for roles that require internal advertisement FRV are receiving a median notification period of 32 days.

- (d) Presently, for Deputy Chief Officer positions in CFA, FRV are receiving notice generally under a fortnight. These are additional positions that FRV cover, despite not actually being required. FRV have consistently reported that they are happy to relieve these positions but it must be acknowledged that this creates a flow-on effect for the Commander/ACFO positions seconded to CFA.
19. It should come as no surprise that data held by the fire agencies demonstrates that, where sufficient notice periods are provided by CFA to FRV, there is a higher percentage of vacancy fill rates by FRV.
 20. FRV substantively fill Command/Secondment positions where requested by CFA. Data held by FRV as at 30 April 2026 demonstrates that there will be only 3 substantive ACFO vacancies by end of week due to the FRV conducting a series of ACFO promotions. Whilst FRV was able to reduce these vacancies down to 2, it was the CFA who requested that the ACFO position in CFA District 27 not be filled substantively.
 21. It must be noted that there is an agreed Annual Leave Plan. However, annual leave is managed/endorsed/approved by CFA Line Managers. Therefore, numbers of those on annual leave at any given time may exceed the agreed Annual Leave Plan numbers, however this is unrelated to the Secondment model.
 22. Never before has there been such a concerted effort to fill senior command roles in the CFA. Prior to Fire Services Reform, vacancies, including many Long Term Vacancies, simply existed. Now, there is a department (FRV Secondment Department) that is dedicated to filling those vacancies where such request is made by CFA. Therefore, any criticism of fire service reform in the context of vacancies, respectfully, can only be made with all data presented, including data held by CFA prior to Fire Services Reform.

1.4 Dual commissioning

23. At page 33 of the VFBV submission, it states that “dual commissioning” is occurring at an “alarming rate”. No statistical evidence or case studies are provided of this.
24. Dual commissioning describes two agencies holding operational command of one employee at the same time.
25. Dual commissioning does not, and cannot, occur. It is made abundantly clear through legislation via s 25C(5) of the FRV Act.⁴ It is also reiterated through various documents and organisational doctrine held by both FRV and CFA.
26. The UFU will contact the VFBV following the Public Hearing today to ascertain details of every instance of dual commissioning that VFBV alleges has occurred. As explained above, dual commissioning *cannot* occur. If it is the case that VFBV has not raised this matter formally prior to placing it in an Inquiry submission, then the UFU undertakes to raise this with CFA, FRV and the Victorian Government.

⁴ Section 25C(5) of the FRV Act provides: “The Chief Officer of the Country Fire Authority has the order and control of the work of an officer or employee of Fire Rescue Victoria who is made available to the Country Fire Authority under a secondment agreement.”

1.5 FRV funding

27. The VFBV submission asserts at page 30 that FRV receives direct Government funding for all seconded positions as part of its base budget, regardless of whether those positions are actually filled. The VFBV characterises this as a structural financial disincentive. That is, it asserts, FRV bears no financial consequence for non-supply, while CFA is left with unfilled positions and no capacity under legislation to fill those positions from any other source.
28. The VFBV's submission fundamentally mischaracterises the nature of the funding arrangement and should be given no weight. FRV receives no separate or specially allocated funding for seconded positions. The costs associated with secondment, including wages, uniforms, equipment and associated employment liabilities of career firefighters, form part of FRV's general operational expenditure, funded through its broader Government grant base. FRV recorded expenditure of \$72.40 million in 2024-25 in complying with the Secondment Agreement.⁵ These are not additional or special funds allocated for secondment. They are the ordinary costs of employing career firefighters, for which FRV, as the employer of all career firefighters in Victoria, bears full legal and financial liability.
29. Critically, CFA receives these services entirely free of charge. The Victorian Government submission confirms that CFA recognised income of approximately \$72 million in 2024-25 relating to services received free of charge from FRV under the Secondment Agreement.⁶ There is no charge to CFA and it bears no employment liability attaching to these personnel.
30. The VFBV's "financial disincentive" argument therefore rests on a false premise: that there exists a discrete pool of secondment funding that FRV can redirect to its own purposes when positions go unfilled. No such pool exists. What exists is FRV's general workforce budget, from which it meets its obligations as employer. The proper characterisation is not that FRV "pockets" funding, it is that the costs of employing career firefighters are borne entirely by FRV and the Victorian Government, with CFA receiving the benefit of those services at no cost.
31. To the extent that vacancy and non-relief remain a genuine operational concern for the VFBV, the appropriate remedy is for CFA and FRV to continue to work collaboratively to strengthen the mechanisms available under the Secondment Agreement to improve fill rates, relief arrangements and workforce planning. A reallocation of funding of the kind proposed by VFBV would not resolve the underlying operational challenges. Rather, it would risk fundamentally distorting the employment framework that the 2020 Fire Services Reform deliberately established, under which FRV bears full responsibility as the employer of career firefighters in Victoria.

⁵ Victorian Government's submission to this Inquiry, p 82: FRV in 2024-25 spent \$72.40 million complying with the secondment agreement which CFA receive free of charge from FRV.

⁶ Ibid.