



**Tasmanian Volunteer Fire Brigades Association
Submission to the Fire Service Act Review**

September 2018

Submission

All references to the Act, unless otherwise stated, refer to the *Fire Service Act 1979*.

1. *Should the purpose of the legislation more accurately reflect the range of activities undertaken?*

The Tasmanian Volunteer Fire Brigades Association (TVFBA) is of the view that the legislation needs to integrate recognition of contemporary practice while not inhibiting any future function which may be provided by the agency. The TVFBA feel that the legislation should include tasks and functions of State Emergency Service personnel to provide for a holistic approach to emergency management in Tasmania. Both fire service personnel and emergency service personnel should have a single framework of operational duties derived from a single source. Further to this, the legislation should include activities in the wider organisational scope of the agency such as provision of educational services in regard to fire and natural disaster, building of community resilience to those events and also risk mitigation operations such as the Fuel Reduction Unit.

The current legislation was drafted with the 1967 bushfire disaster being within recent memory, since that point in time the activities of the fire service have broadened to include functions which were not contemplated at the time, such as road crash rescue. To this end, the TVFBA believe that the legislation needs to be drafted in a manner which does not inhibit the future tasks, activities and responsibilities of the agency. Principles based legislation which permits for unthought-of activities would allow for a dynamic and adaptable response to emergencies within Tasmania. Given the scope of societal expectations on the agency the TVFBA believe a holistic principles-based approach to emergency response within the legislation will allow the agency to meet those expectations.

2. *How should legislation validate the delivery of the current range of non-fire services that communities and government expect TFS to deliver?*

The main outcome of the Act review, aside from strengthening governance arrangements, must be to validate current practice by legislative reform. The TVFBA believe in a principles-based approach to empowering the agency to respond to incidents. Current 'core business' activities have evolved since the current Act was drafted and the outcome of the review must provide a clear mandate for the agency on responding to non-fire emergencies.

While the community and government may expect a broader range of services from the agency than in the 1970's, the TVFBA believe that the legislation should only validate those activities which fit into the broader spectrum of 'core business'. To this end non-fire services which mitigate risk, be it through education of the public or physical risk mitigation, should be validated as non-operational deliverables of the agency. Physical reduction of fuel loads or work associated with developing structures in risk prone areas are integral functions of an agency responsible for fire control as these functions reduce the overall stress on the agency in the event of fire. Furthermore, education of the public from a school age

right through to seniors, is an important task which advances the agencies objectives of protecting life, property and the environment.

Other activities which fall outside the scope of 'core business' of the agency are better left to the external market to allow for unhindered regulation of these areas. Where there are services available externally the agency should not be a market competitor. Where the market provides such services, under the relevant provisions of the legislation the agency should be proactively regulating these external providers. The TVFBA however is cognisant that cessation of some of these services would have a negative impact for some not for profit and government enterprises who rely on the agency to deliver these services. The TVFBA feel that this void would not be a question for the agency but rather a policy issue for the government of the day.

3. Do TFS firefighters have a role in Emergency Medical Response and, if so, should that role be reflected in legislation?

As indicated above, the role of firefighters in Tasmania has developed since 1979. Currently both career and volunteer firefighters play an important role in providing emergency medical assistance across the state to varying degrees. Often volunteer firefighters may be first on scene (depending on geographical location) to motor vehicle accidents and road crash rescues of which volunteers are relied upon for primary patient care. The scope of that care ranges from treatment for shock utilising oxygen therapy to CPR and the use of defibrillators. Currently this function is not recognised in the legislation, nor is the role of assist ambulances callouts. As denoted above, it is imperative that the legislation recognise activities currently undertaken by members of the agency along with any future roles that may develop.

The Tasmanian Volunteer Fire Fighters Association supports what is best for the delivery of emergency response in Tasmania. Any further development in the role of emergency medical response, or indeed any other area, must have the associated level of training delivered with it. Funding would need to be sufficient to educate members of the agency to the requisite level and then allow for the skills maintenance of that training. In the context of volunteer firefighters, who are already relied upon to devote time to emergency response, flexible training opportunities must be available to them in this field. Any agency role in medical response would also have to allow for those members, who volunteer to be firefighters, to not undertake emergency medical response should they not wish to do so.

The most critical aspect of integrating emergency medical response from firefighters into the legislation is to ensure that agency members have adequate statutory indemnity for actions taken in providing that response under the legislation. Further to this, volunteers need a commitment to adequate support services for the increase in emergency medical response and the flow on impacts on a volunteer's family and mental health. Volunteers already are routinely exposed to traumatic events and fatalities however an increase of workload in the area of emergency medical response would need to be coupled with appropriate support mechanisms for both volunteers and their families who they go home to

after such incidents. The legislation should also contain a commitment to the provision of adequate access to training should a member wish to have a role in emergency medical response. It is important to note that while the TVFBA is supportive working towards a way forward for the provision of emergency medical response, it must not fall upon the agency to bear the responsibility for medical response in Tasmania.

4. *Should the State Emergency Service be included in the new legislation and removed from the Emergency Management Act?*

Given the current operational context of the State Emergency Service and the similar volunteer staff base, the TVFBA see the Act review as being the perfect opportunity to integrate the response and operational provisions from the *Emergency Management Act 2006* into the reviewed Act. The TVFBA are supportive of encouraging resource sharing in terms of cross skilling and training opportunities, along with an alignment of support staff and stations where it may be more economical to do so. An example of this would be members of brigades throughout the midlands of Tasmania with brigades such as Kempton and Campbelltown having predominantly common membership and often operate from the same station.

The TVFBA cognisant of the issue of identity retention for SES and TFS in terms of their front-line service delivery and would be open to further consultation with our volunteers in this regard. While encouraging front line collaboration, and agency resource sharing, the TVFBA are of the view that SES should come under the equivalent of a 'deputy chief officer' who would retain the operational command of SES through a similar regional structure. It is also felt that a revised Act should not inhibit any future agency decisions which may eventually lead to a fully integrated emergency response service at a later point in time. With provisions relating to the operational elements of SES integrated into the Act, the TVFBA are cognisant that the future funding model will need to be addressed.

5. *Should a statement of commitment to volunteers be included in the new legislation and, if so, who and what should it cover?*

Given the inherent nature of the fire service in Tasmania being an organisation which relies heavily on volunteers it is imperative that a holistic approach to supporting and enabling volunteers is present within the Act. Tasmanian geography coupled with a limited population based on regional areas results in the only economically viable model being a primarily volunteer based emergency response. With 250¹ career staff and 4,800² volunteers the TVFBA submits that the legislation should be drafted with volunteers in mind throughout.

With the value of volunteer contribution to emergency response in Tasmania not generally fully understood by the public it is important to enshrine within the legislation a commitment to equality between career and volunteer firefighters. Equal utilisation of volunteers in specialist roles, along with the opportunity to gain

¹ <http://www.fire.tas.gov.au/Show?pageld=colAbout> retrieved 27 August 2018

² *ibid*

and then maintain such skills will not only provide economic benefit to the agency budget but also give volunteers a better sense of recognition. Career development pathways for all volunteers should be in place and opportunity to progress through those pathways should not be inhibited by lack of training courses available.

Given the dedication and skill (which include existing 'civilian' skills from a wide variety of areas) that volunteers bring to the agency the legislation should not prevent a volunteer from doing anything which a career member does in the context of emergency response. Furthermore, it is submitted that with the limited population growth in rural and remote areas it is important that volunteer brigades be enabled to build up numbers in regional and populated areas in order to provide prolonged volunteer surge capacity into those more rural areas in the event of a major incident. To this end the TVFBA would consider some form of provision enabling unpaid leave for volunteers from their employers for response to emergencies may be an option.

The TVFBA also believe that the Association should be recognised in the legislation in terms of being the representative body which advocate on behalf of and promotes volunteer engagement and welfare for our volunteers. Provision in the legislation recognising a continuation of the commitment to recognise the Association will enshrine a dedicated commitment to volunteers. It should be legislated that every decision which impacts volunteers should be a decision which is reached in consultation with the Association.

6. *Should the legislation provide PWS and forest officers with appropriate legislative authority to undertake fire control work and reflect contemporary Tasmanian practice in relation to Inter-Agency Incident Management?*

The Tasmanian Volunteer Fire Brigades Association is committed to legislative change enabling the most appropriate model to achieve best practice fire management in Tasmania. Fire does not recognise land tenure boundaries and in terms of suppression it is only logical that the first agency on site should have legislative provision to undertake fire control work. The scope of the legislation needs to recognise skill sets of agencies outside the TFS and their contribution to fire management. The TVFBA however is committed to ensuring that while other agencies have a supportive role to play in fire management, the command structure of fire control must remain vested in the TFS. The Act must also not inhibit any future potential integration of fire control from external agencies into the fire service.

7. *Should the State Fire Commission remain as a Statutory Authority?*

As the majority of funding is appropriated externally the TVFBA believes that the Commission should remain a Statutory Authority. The TVFBA feels strongly that the Commission must retain fiscal independence from government and retain control of the agency in delivering its objectives in emergency response.

8. Should the State Fire Commission have the role of a governing Board?

The TVFBA strongly hold the view that the Commission must retain its independence to maintain financial security and uninhibited control of the agency. With the integration of SES the TVFBA are cognisant that the makeup of the governing body must change. This will be addressed below.

The TVFBA understand the current model needs to change to reflect contemporary best practice governance arrangements for a Statutory Authority in the 21st Century. To this end the governance structure should be modelled towards management structures of private enterprise and government business enterprises. The TVFBA would like to moot the potential advantages of the Commission/Board having the ability to employ staff independent of the State Service. The Commission/Board, with governance oversight of emergency response across Tasmanian (discussed below), could then have the ability to appoint and have influence over the role of Chief Officer. To this end the TVFBA are of the view that a Commissioner/Chief Executive Officer role would be an appropriate replacement of the current Chief Officer role which will be discussed below. The TVFBA believe that the Commission/Board must retain authority over all operational aspects of the agency.

9. Should members of the Commission be appointed as representatives of their organisation or on the basis of skills/knowledge that they possess?

The Tasmanian Volunteer Fire Brigades Association feel passionately about the retention of volunteer representation on the Commission/Board. The TVFBA is also cognisant of the need to ensure a sound governance structure is in place. To that end the TVFBA would advocate for a hybrid of skills/knowledge and representative appointments. With almost 1% of the population being volunteer firefighters the TVFBA highlight that the ability to appoint a volunteer firefighter with either the relevant financial acumen or prior experience in both government/private enterprise governance arrangements to fill a representative role.

Being a volunteer agency with a proportionally small career element dictates that a representative relationship should operate to effectively assist in engagement for the agency as a whole and for the volunteers who work under the Commission/Board. Volunteer representation provides a good level of engagement for the volunteer workforce by having a direct relationship within the governance structure. The TVFBA having representation at the Commission/Board level allows for direct influence over volunteer strategy which is an integral dependence of the agency. Having volunteer representation on the Commission/Board is critical to keeping the volunteer workforce engaged.

Membership of the Commission/Board must include representation of those who are the primary workforce and volunteer their time to allow the agency to operate. Without volunteers the agency would fail to meet its objectives without being a major fiscal drain on the Tasmanian tax payer. Representative membership should be coupled with a mix of members who have relevant skills in governance, law and finance. All members of the Commission/Board should be provided with the

opportunity to undertake an Institute of Company Directors course at the outset of their appointment.

10. What should be the State Fire Commission's role and function and should it include the strategic policy setting and administrative oversight of the State Emergency Service?

In the context of setting best practice emergency response for the Tasmanian public the TVFBA believe that the Commission/Board should have full oversight of the State Emergency Service. The TVFBA believe that certainty around future funding could be overcome and full operational control should be vested in the Commissioner/CEO of the agency. A single source for emergency response governance in the state will ensure a coordinated effort between the current TFS and SES. The TVFBA are open to the idea of the State Fire Commission taking the role of an emergency management commission/board and having the Commissioner/CEO responsible for the agency delivering emergency management in the state. To this end the TVFBA support the full integration of the operational elements of the SES into the Act.

11. What structural arrangements would best allow the Commission and TFS to achieve their objectives while operating in a departmental environment?

The TVFBA firmly believe that the Commission/Board needs to retain its independence for operational elements in delivering emergency response. The TVFBA feel that the Commission/Board should have a service delivery agreement with the Secretary of the Department of Police, Fire and Emergency Management for key deliverables relating to administrative and non-operational functions. Such an arrangement would set clear objectives for the Department to deliver on and the Commission/Board would have the ability to hold the Department accountable under the arrangement. This arrangement would allow the Commission/Board to focus on the operational governance and policy arrangements of emergency response and non-operational functions would have clear deliverable expectations set. This relationship would also give rise to a direct relationship between the Commission/Board and the Secretary in regard to facilitating the administrative and non-operational functions of emergency management.

The Commission/Board's independence from the Department would give rise to a direct relationship being necessary between the Minister and the Commission/Board. Such a relationship should be treated equal to the flow of communication between the Minister and the Secretary however given the Commission/Board's independence from government this relationship must only be one of advice.

12. How should the Chief Officer be appointed and to whom is he responsible?

It is imperative in context of the view above put forward by the TVFBA that the current role of Chief Officer be a direct employee of the Commission/Board. The current role of Chief Officer should be replaced by a Commissioner or Chief

Executive Officer who is appointed and is answerable to the Commission/Board. The TVFBA believe that any appointment to this role must be independent of government and the role must be under the sole direction of the Commission/Board. This provides for a level of accountability and clarifies the role in terms of the direction the agency heads in delivering emergency response in Tasmania.

13. Should it still be specified that the Chief Officer is to have expertise and experience in fire service administration and in the management of fire-fighting operations?

The TVFBA is of the view that the role of Commissioner/CEO (Currently Chief Officer) does not need to be a role limited to those who have experience in firefighting operations. The Commissioner/CEO role is an organisational leadership role which must have strong leadership and best practice management ability rather than an ability to suppress fire. Limiting the role to a person who has spent their career in firefighting operations does not necessarily demonstrate an ability to perform best corporate governance techniques within the agency. While it is necessary to ensure sound fire-fighting management ability in ranks within the agency at a regional level to ensure effective chain of command and incident management, it is not necessary for the role of Commissioner/CEO.

The TVFBA would rather see a Commission/Board appointed Commissioner/CEO effectively manage the agency and ensure mechanisms are in place to deliver the best outcome emergency response in Tasmania rather than actively partake in the chain of command. The TVFBA would envisage that this role would then have three streams of directorates reporting to the Commissioner/CEO being fire response, emergency service response and a non-operational stream. Each directorate would be headed up by a director who would be the equivalent of a deputy chief role in terms of being the operational leader in the respective areas. The Director of Fire would have experience firefighting management, the Director of Emergency Response would have experience not dissimilar to that of the present director SES and the Director in charge of the non-operational stream would have experience in risk mitigation via education, planning and public engagement.

14. How should potential tensions between the roles and accountabilities of the Chief Officer TFS, the Director SES and the State Controller be best resolved?

Given the integration of functions from the *Emergency Management Act 2006* discussed above being added to the revised Act as per our submissions above, the TVFBA believe that the potential tensions between the existing model of a Chief Officer and the Director SES would be resolved via the overarching appointment of a Commissioner/CEO to oversee the existing Tasmania Fire Service and the State Emergency Service. The Commission/Board would then have oversight of the governance of both entities within a single agency.

The conflict in roles between the State Controller and both current roles of heads of TFS and SES would be overcome by the current responsibility of those roles

being vested in the Commission/Board. The day to day function of that role would be delegated to the Commissioner/CEO and the relevant Directors. In the event of a State Emergency (of which the provisions dealing with State Emergencies we envisage to remain in the *Emergency Management Act 2006*) the role and accountabilities of the Commission/Board would be handed to the State Controller in their entirety for the duration of the declaration of the State Emergency. To this end, the Commissioner/CEO would report directly to the State Controller but only for the duration that the State Emergency is declared.

15. What is the appropriate role and function of the SFMC and what should the relationship be with the State Fire Commission/TFS?

While the State Fire Management Council is a creature of the current Act, the TVFBA feel that the SFMC has an important role to play in risk mitigation planning across the state. Having said this the TVFBA feel that reform in this area could lead to the integration of a whole of natural hazard approach to the Council's role. A Natural Hazard Management Council (a hybrid of the State Fire Management Council and the State Emergency Management Committee) could advise the Commission/Board to allow it to plan and arrange oversight of risk mitigation measures expected of emergency services in the 21st century. This Council would have a direct advisory relationship with the non-operational directorate of the agency in working towards risk mitigation initiatives.

The Council would primarily provide an advisory role to the Commission/Board but also could continue to have an advisory role to government on natural hazard mitigation issues which fall outside the remit of the Commission/Board.

16. What is the appropriate membership of the SFMC and should the membership be prescribed in legislation?

The TVFBA believes that the membership of the Council should continue to accurately reflect the interests of major land managers and technical experts from across the state. The Council should also continue to include agency representatives including the Commissioner/CEO and the person responsible for the management of the fuel reduction unit and the Emergency Response Directorate. The membership of the Council should be prescribed in the legislation to provide clarity.

17. Should the State Fire Management Council have the power to appoint permit officers?

The TVFBA is of the opinion that all permit officers should be appointed via the Commission/Board as to ensure centralised control from a policy perspective.

18. Are the Fire Management Areas and the composition of the Fire Management Area Committees still appropriate?

In the context of working towards a single natural hazard/emergency response agency controlled by the Commission/Board the TVFBA believe that Fire Management Area Committees should be merged with Municipal Emergency Management Committees and Regional Emergency Management Committees to

feed into the Natural Hazards Management Council. The composition of these areas should be reviewed to ensure a mix consistent with factors such as area and population. The TVFBA also feel that the Fuel Reduction Unit should have representation on these committees.

19. What opportunities exist to streamline Fire Management Area Committees with Emergency Management Committees?

As per above the TVFBA believe in a holistic approach to natural hazard mitigation and natural disaster prevention.

20. Should fire and emergency services be funded through a single mechanism? If so, what is the appropriate model?

The TVFBA hold the view that the Commission/Board funding should be primarily appropriated funds as a statutory authority. This funding model however should be on a spectrum to provide some funding also from consolidated revenue especially for some non-operational deliverables. The TVFBA believe that the most appropriate model would be not too dissimilar to the current models all be it an 'emergency response' levy from insurers, motor vehicles and contributions collected from rate payers. The TVFBA see the implementation post review as also being the optimum time to centralise the collection of the levy to ensure consistency across Tasmania (i.e. a rate exemption having impact on collecting the fire levy collected by local councils). Recognition of wildfire reimbursement arrangements should also be integrated into any legislative change.

21. Should SES centrally manage and fund its volunteer unit facilities, its fleet and its operational expenses?

The TVFBA are cognisant of the fact that we do not have members to whom the question of SES centralisation relates however we, as an Association in the context of fire, have found benefit historically in centralising the model after the original inception of the present Tasmania Fire Service.

22. Should any new legislation bind the Crown?

The TVFBA believe that any reformed legislation should bind the Crown. The Commission/Board must have independence in applying the provisions of a reformed Act. This will provide clarity around application of the Act and could refer to external response arrangement on Commonwealth land.

23. How should response, command and control arrangements be handled in new legislation?

In regard to land tenure agencies the TVBFA are of the opinion that appliances, whether they be fire service or other land tenure managers, which are first on scene need to be enabled to conduct firefighting operations with legal authority. At the point in time which the fire service arrives command and control should then be handed to the fire service at the discretion of the first arriving fire service officer. The TVFBA believe that it is vital that incident control be a delegated function of the Commissioner/CEO.

24. Should the Chain of Command be included in legislation with accountabilities included?

While it may be beneficial to increase the accountabilities within the Chain of Command, the TVFBA submit that the Chain of Command should not be legislated. The operational command and governance arrangements permitting to the accountabilities of each level within the command structure should be entirely left to the Commission/Board. The independence of the Commission/Board and its ability to ensure sound governance must not be inhibited by the Chain of Command being dictated in the legislation. The TVFBA further submit that similar arrangements within the command and control structure of SES should also be vested in the Commission/Board.

25. Should endorsement of Incident Controllers be legislated? Making it clear that all emergency responders present at an incident are in all respects subject to the Incident Controller's direction or should Incident Controllers be endorsed through policy?

The TVFBA believe that the Incident Controller needs clear legislative authority which protects him/her and places other people whether they be members of other agencies or civilians under the IC's control. The TVFBA to this end would welcome the opportunity to make comment of any proposal to include such an authority in the legislation. The TVFBA are cognisant of bedding down an Incident Control endorsement which does not undermine the ability and skill of our volunteers.

26. Are the provisions relating to the establishment and composition of brigades still appropriate?

The TVFBA believe that the provisions relating to the establishment and composition of brigades are still appropriate. However, given the expanded context of emergency response functions which are undertaken by members of the agency the TVFBA submits that the provisions of section 29 need to be expanded to cover current and not inhibit future roles of the agency.

Consideration also needs to be given to the powers conferred to brigade chiefs in section 29 of the Act in regard to expanding those authorities to operate in the wider context of emergency response and also the ability to give direction in regard to other utilities and not just water.

27. Should Industry Brigades be recognised in legislation and have the ability to assist in emergency response outside the industry boundaries?

The TVFBA believe that industry brigades have an important role to play in fire suppression within their industry boundaries. The TVFBA hold the view that industry brigades should be registered with the Commission/Board and be regulated to a standard which would allow them to respond to incidents outside their industry boundaries. Industry brigades would fall under the command and control of the Commission/Board's doctrine and would only be requested to attend outside their industry boundary at the request of the incident controller.

28. Should the Act be amended to specify these activities are exempt from the provisions of the LUPAA?

With risk mitigation being a primary objective of what the public expect from the Agency the Tasmanian Volunteer Fire Brigades Association believe that all fuel reductions burns conducted by the agency should be exempt from the *Land Use Planning and Approvals Act 1993*. The TVFBA feel that such an exemption would be encourage fuel load reduction and mitigate any potential conflicts which would become an administrative burden on volunteer brigades.

29. Are the provisions relating to the declaration of Total Fire Bans still appropriate?

The TVFBA believe that the current provisions are still appropriate although it would be beneficial to embed the current practice in regard to machinery operation guidelines into a mandatory code of practice.

30. Should Community Education be an explicit function of SFC/TFS and should it include the SES?

A key objective of the Commission/Board is to reduce risk to the public associated with hazards in regard to fire (and as expressed above other natural hazards). The TVFBA view community education as a key function in increasing risk mitigation and building community resilience in response to natural disaster. With responsibility vested in the non-operational directorate, express direction can be given from the Commission/Board to ensure that community expectations around education are met.

31. Is it still appropriate that TFS issues permits to install, maintain or repair fire protection equipment?

The TVFBA feel that any reform of the Act should strive to reduce or remove any potential, or perceived potential, conflicts of interest as to ensure community confidence in the Agency.

32. Should there be a whole of government Emergency Evacuation System that deals with all threats, not just fire risks, in the built environment? Should prescribed buildings be categorised by risk potential?

The TVFBA is supportive of opportunities for best practice emergency management in Tasmania.

33. Are the current levels and structure of penalties appropriate?

The TVFBA would advocate for a full review to be conducted of the current level and structure of penalties, the outcome of which could be integrated into the legislative change. The TVFBA would be supportive of penalties which have the option of being daily to encourage the reduction of risk to the public.

34. Are there other offences that should be considered for inclusion in new legislation?

The TVFBA would be supportive of introducing new offences in the Act such as interfering with a fire appliance, using water stored for fire-fighting for a purpose other than fire suppression, or discarding an object which is known to be alight. Another offence the TVFBA believe should be included is a provision to deal with failure to comply with the direction of a fire officer. This would give our members authority when protecting the public at emergency incidents. The TVFBA suggest that Tasmania Police and the Department of Public Prosecutions may have advice on this matter.

35. Are the current protection from liability provisions appropriate?

The TVFBA are cognisant of the increasing role that our volunteers perform in providing emergency response to the Tasmanian public. The TVFBA believe that our volunteers need an increase in their protection from liability to ensure that any person who is engaged in brigade related activity, including but not limited to any type of emergency response, are indemnified from liability. This is an integral issue for volunteers who dedicate their time to serving the community. The TVFBA feel strongly that the indemnity provisions need to be carefully considered and must be equally applicable to both career staff and volunteers.

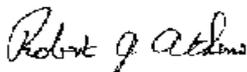
Conclusion

This submission is made on behalf of the Tasmanian Volunteer Fire Brigades Association by the TVFBA Act Review Working Party as appointed by the State Council of the TVFBA.

This submission is by no means exhaustive and the working party would welcome any opportunity to clarify our position of any points detailed herein or any issue not detailed within this paper.

One piece of legislative reform that the TVFBA have been pursuing for some time is a reduced speed limit, in line with road works and school buses, for emergency incidents. Regularly our members work in dangerous environments on roadways and have to contend with traffic passing in close proximity at speeds of up to 110kph. The TVFBA view this as an unacceptable risk to our volunteer firefighters and are advocating for legislative change to deal with the issue in line with a number of mainland states.

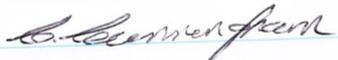
On behalf of the State Council of the TVFBA we would like to thank the Fire Service Act Review Working Party for affording us the opportunity for make this submission.



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