

**SUBMISSIONS OF THE
UNITED FIREFIGHTERS UNION OF AUSTRALIA**

A INTRODUCTION

1. Recent unprecedented global shocks to oil supply spurred by unpredictable conflict in the Middle East, and the resulting sharp increases in retail petrol and diesel prices in Australia coupled with recent changes to CPI reporting, have exposed a practical deficiency in vehicle allowances across modern awards, including the *Fire Fighting Industry Award 2020* (**Award**). The current standard allowance adjustment mechanism is unable to respond adequately to a sudden and substantial increase in the cost that employees incur when they are required to use a private vehicle in their employment.
2. These submissions are filed on behalf of the United Firefighters Union of Australia (**UFUA**) in support of its application under section 158 of the *Fair Work Act 2009* (Cth) (**FW Act**) to vary the Award by inserting a temporary schedule and updating the monetary value of the vehicle allowance in the Award in accordance with that schedule, in line with applications made to vary other awards.¹
3. The UFUA has had the benefit of reading and considering the ACTU’s submissions filed on 24 April 2026 and relies on those submissions as they concern relevant matters affecting the Award.
4. These submissions are intended to supplement the ACTU’s submissions in respect of the UFUA’s application.
5. These submissions are structured as follows:
 - (a) **Part B** addresses the relevant background; and
 - (b) **Part C** addresses why the Commission can be satisfied that the proposed variation is necessary to achieve the modern awards objective.

¹ AM2026/10, AM2026/12, and AM2026/13.

B BACKGROUND

Award

6. The Award provides for the following vehicle allowance:

20.4 Vehicle allowance

(a) Any employee who is required by the employer to use their own motor vehicle on the employer's business, and is not otherwise entitled to an allowance in respect of the cost of travel, will be entitled to receive an allowance of:

- (i) **\$0.99** per kilometre in the case of a motor vehicle; and
- (ii) **\$0.33** per kilometre in the case of a motorcycle.

7. The Award also contains, at Schedule B.2.3, the "Standard Adjustment Clause" as described in the ACTU's submissions.²

Evidence

8. The UFUA relies on the witness statement of Peter Shroder dated 25 April 2026. Mr Shroder is employed by Fire Rescue Victoria (**FRV**) as a Leading Fire Fighter.
9. FRV was formed in July 2020 from employees of the Metropolitan Fire Brigade (**MFB**) and operational employees of the Country Fire Authority (**CFA**) into Division A and Division B respectively.
10. FRV currently has 85 fire stations across Victoria.
11. Mr Shroder has been employed by FRV since its formation on 1 July 2020 in Division A and was previously employed by the MFB from 2007.
12. Mr Shroder's evidence identifies a number of work-related circumstances in which he uses his private vehicle. Those circumstances include travel connected with health and safety committees, working parties, station inspections, standby and recall duties, and other ad hoc work-related travel.
13. In March 2026, he claimed vehicle allowance for 906 kilometres of travel, and he estimates that, on average, he travels and claims the vehicle allowance for between 500 and 1,000 kilometres per month.

² ACTU submissions [96]–[103].

14. Although Mr Shroder is covered in his employment by *Fire Rescue Victoria Operation Employees Interim Enterprise Agreement 2010 (Agreement)*, the Award's vehicle allowance underpins the Agreement's in several relevant clauses.³

Conclusions

15. The following conclusions can be drawn from the evidence and the terms of the Award:
- (a) The firefighting industry serves an important public good, including the protection of life, property, and the community from fire risks.
 - (b) As the firefighting industry provides emergency services, all firefighters and operational staff must attend their workplace not only to undertake their duties but also to undertake their compulsory and vital skills maintenance and skills acquisition.
 - (c) Employees in the firefighting industry may be required to use their own vehicles for such work-related travel.
 - (d) That travel may arise in a range of ordinary employment contexts, including operational deployment, standby, recall, training, health and safety representation, consultation, inspections, training and other directed or authorised work activities.
 - (e) Such travel is carried out in service and principally for the benefit of the employer and, in the case of the firefighting industry, the community at large.
 - (f) The distances involved may be significant, in the range of 500 to 1,000 kilometres per month.
 - (g) Where an employee uses their own vehicle for work purposes, the employee may incur the vehicle operating costs in the first instance, including fuel costs.
 - (h) The vehicle allowance in the Award is directed to reimbursing, or at least compensating for, those employee-incurred costs.
 - (i) Where fuel prices increase materially before the allowance is adjusted, the employee bears the difference between the actual cost incurred and the allowance received.

³ See e.g., Agreement, Schedule 3 – Division B Occupational Health & Safety Agreement, item 4.2.2; Personal Expenses and Accommodation Agreement 2015, item 2.8.

- (j) The Award vehicle allowance is an important reference point where enterprise instruments incorporate, refer to, or operate alongside the Award allowance, as occurs with the Agreement, covering fire fighters across Victoria.
- (k) An expense-related vehicle allowance will not perform its intended function if it does not maintain a reasonable relationship with the cost of using a private vehicle for work purposes.

C MODERN AWARDS OBJECTIVE

- 16. The Commission may make a determination varying a modern award under section 157(1)(a) of the FW Act if satisfied that the variation is necessary to achieve the modern awards objective in section 134.
- 17. The Commission must ensure that modern awards, together with the National Employment Standards, provide a fair and relevant minimum safety net of terms and conditions. The Commission can be satisfied that the proposed variation is necessary to achieve that objective, taking into account the relevant considerations in section 134(1).
- 18. In addition to the matters raised by the ACTU in respect of the modern award objectives, the UFUA relies on the following matters:
 - (a) **Section 134(1)(d) – the need to promote flexible modern work practices and the efficient and productive performance of work.** Firefighting work is inherently place-based. Use of a personal vehicle mobilises otherwise idle assets into productive economic activity. In the firefighting industry, that productive activity has particular social value as emergency services are principally a public good. A vehicle allowance that maintains a reasonable relationship with the cost of employer-required travel supports the efficient and productive performance of that work.
 - (b) **Sections 134(1)(f) and (h) – the likely impact on business etc.; and the likely impact on employment growth, inflation and the sustainability, performance and competitiveness of the national economy.** The proposed variation is confined to maintaining the value of an existing expense-related allowance. In any event, the cost of work-related travel will be borne either by the employee or by the employer. As a matter of policy, the cost of travel undertaken in the course of employment in emergency services, should be borne by the employer, not the employee.
 - (c) **Section 134(1)(g) – the need to ensure a simple, easy to understand, stable and sustainable modern award system that avoids unnecessary overlap of modern**

awards. The proposed schedule uses an objective CPI mechanism of the same general character as the existing Award adjustment mechanism. It is preferable to repeated urgent award variation applications if there are ongoing and unpredictable shocks to fuel prices.

19. The UFUA accordingly submits that the Commission should vary the Award in the terms sought in the draft determination filed with the application.

27 April 2026

Paris Lettau
Counsel for the UFUA

The United Firefighters Union of Australia

AM2026/11 – United Firefighters’ Union of Australia

FAIR WORK COMMISSION

Application to vary vehicle allowances in the *Fire Fighting Industry Award 2020*

STATEMENT OF PETER SHRODER

I, Peter Shroder of Fire Rescue Victoria Fire Station 44, Sunshine North, Victoria 3020, say:

Employment

1. I am employed by Fire Rescue Victoria (**FRV**) in Division A and have been since 1 July 2020. I was previously employed by the Metropolitan Fire Brigade (**MFB**) since 2007.
2. I currently hold the rank of Leading Fire Fighter and have held this rank since 2011.
3. My home fire station is at Sunshine (FS44).
4. I am covered by the *Fire Rescue Victoria Operation Employees Interim Enterprise Agreement 2010 (Agreement)*. The Agreement also refers to the *Fire Fighting Industry Award 2020 (Award)*.
5. I am an elected member of the Victorian Branch Committee of Management of the United Firefighters Union of Australia (**UFU**).

Fire Rescue Victoria

6. FRV was created on 1 July 2020. Before that, the Metropolitan Fire Brigade (**MFB**) and the Country Fire Authority (**CFA**) were separate fire services. On and from 1 July 2020, professional firefighters previously employed by MFB and the CFA (as well as new employees) became employees of FRV.
7. The Agreement is made up of two Divisions:
 - a. Division A applies to transferring MFB operational employees and any other person employed by FRV since 1 July 2020 to perform work performed by an employee engaged in a classification or occupation referred to in Division A, where such work was formerly performed by employees of the MFB in the Metropolitan Fire District: and

- b. Division B applies to transferring CFA operational employees and any other person employed by FRV since 1 July 2020 to perform work performed by an employee engaged in a classification or occupation referred to in Division B, where such work was formerly performed by employees of the CFA in the areas not covered by the Metropolitan Fire District.

Districts and Fires Stations

8. FRV currently has 85 stations in Victoria.
9. Attached and marked **PS-1** is a list of these stations taken from the FRV website.
10. These fire stations are across the following districts:
 - a. Central
 - b. Eastern
 - c. Southern 1
 - d. Southern 2
 - e. South & East Regional
 - f. Northern
 - g. Western 1
 - h. Western 2
 - i. Western 3
 - j. North & West Regional
11. Attached and marked **PS-2** is a copy of a map of the FRV Stations and Districts.
12. Division A of FRV (previously the MFB) has districts and fires stations across Victoria.

Platoons

13. Each district in Division A has four platoons (A, B, C and D). A platoon is a designated shift on each roster.
14. I am employed in the Western District 2 “B Platoon” at Sunshine Fire Station Number 44. My platoon at Sunshine fire station, currently has eleven (11) firefighters. The number of firefighters in platoons at stations range from 4 to 20 firefighters.

Standby and Recall

15. On occasions, fire fighters do standby or recall.
16. Standby occurs when a shift is “over strength”, meaning more fire fighters are on shift than required. When the shift is over strength, a fire fighter will usually be required to fill a vacancy at another fire station. This is usually rotated between fire fighters. A standby fire fighter needs to travel to the fire station where they are filling in.
17. On average, I estimate that I work standby about once a month.
18. Recall is when a shift does not have enough fire fighters, and an off-shift fire fighter is recalled. I am asked to do recall daily, or almost daily, on my days off. I rarely accept it, but other fire fighters do.

Designated Work Groups and HSR

19. Division A has a designated work group (**DWG**) for each platoon within each district.
20. Each DWG then has one health and safety representative (**HSR**) and one Deputy HSR.
21. Western 1 and Western 2 are an anomaly as the two districts used to be one before they were divided about 3 years ago. There is currently only one DWG for Western 1–2 district.
22. I have been a HSR for around 14 years and am currently the HSR for the Western District 1–2 “B Platoon” designated work group.
23. Division B usually has one HSR and one Deputy HSR per fire station.

Subcommittees I am a member of

24. As part of my employment with FRV, I am part of the following subcommittees or working parties:
 - a. **Operational Employees OHS Subcommittee** – This subcommittee meets every 2 months. These are usually Zoom meetings, but sometimes as part of the subcommittee I am required to inspect projects that sit under that subcommittee. For example, there is a trial at the moment using charity-like donation bins, at the rear of some fire stations to put soiled and contaminated PPC in, and for these meetings we have met on site at different fire stations.
 - b. **OHS Policy Subcommittee** – This subcommittee meets every 2 months (every other month to the Operation Employees OHS Subcommittee). These meetings

are also usually held on Zoom. In addition to these meetings, we also meet in person at Spring Street in the Melbourne CBD and Western district Headquarters with the Assistant Chief Fire Officer of health and safety on an ad hoc basis, around 8 times per year.

- c. **Western 1 and 2 Health and Safety Committee** – This committee meets quarterly with HSRs. These are usually held at Western 1 HQ, Millers Road Brooklyn or Western 2 HQ, Melrose Drive Tullamarine.
- d. **Medical Services Working Party** – This working party meets on an ad hoc basis but on average about quarterly. These meetings are usually held at Spring Street in Melbourne’s CBD.
- e. **Diesel Extraction Working Party** – This working party meets on an ad hoc basis about quarterly on average. These are a mix of Zoom or in person meetings. The split is roughly is 50:50 between Zoom and in person meetings. The split is roughly is 50:50 between Zoom and in person at Division A and B fire stations. I am also the subject matter expert for the diesel extraction systems, so I conduct training throughout Victoria as part of this working party. So far training has been completed at about 27 FRV stations. There are approximately another 58 stations to go. I will be conducting about 20 to 30 of those training sessions.
- f. **Resource and Deployment Approval Panel (RADAP)** – This panel meets monthly usually via Zoom. On top of that I do inspections at fire stations approximately once a month with others in the group. This panel looks after infrastructure of FRV such as new station builds, refurbishments, or other building maintenance. After works are done, we do a walk through to sign off on the works to make sure the on-shift fire fighters are happy with the results and the works are to specification.

Use of my personal vehicle for work purposes

- 25. I own and drive a 2022 diesel Mitsubishi Triton Ute.
- 26. I am required to use my personal vehicle for work purposes regularly.
- 27. My travel is usually within greater Melbourne, but occasionally I travel to fire stations outside this area, for example to Bendigo (about three times in the last year as part of

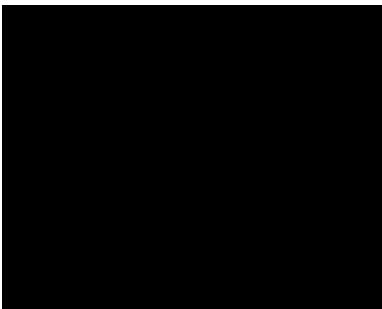
RADAP) or Geelong (about one time in the last year for the Operational Employees OHS Subcommittee).

Vehicle allowance I receive

28. I receive a vehicle allowance for some of my work travel using my personal vehicle, including travel for:
 - a. the committees and working parties work I refer to above;
 - b. recall work;
 - c. standby work;
 - d. other ad hoc travel work as part of my employment.
29. I currently receive a \$1.20 per kilometre vehicle allowance. I understand this amount excludes tax.
30. When I use my personal vehicle for work purposes, I pay for my own petrol using my personal credit card and then claim the vehicle allowance.
31. In Division A, the allowance is claimed through petty cash. After I travel, I will come to work and fill out a petty cash book and take the allowance directly from petty cash. For example, if I used my vehicle to travel 10 km for work, I enter the details of the travel into the petty cash book and then take \$12 from petty cash.
32. In Division B, fire fighters log their travel, and it is paid through payroll.
33. In March 2026, I claimed 906 km in vehicle allowance.
34. Attached and marked **PS-3** is a copy of my petty cash claims submitted to FRV in March 2026.
35. This included for the following:
 - a. **202 kilometres** claimed for 7 January 2026 – I travelled to meet with the Psychological Services team to discuss the implementation of an Emergency Services Health Portal. This was part of the Operational Employees OHS Subcommittee.
 - b. **24 kilometres** claimed for 6 March 2026 – I travelled to Taylors Lakes Fire Station FS48, 470 Melton Hwy, Taylors Lakes on standby as an overstrength

firefighter to fill an operational vacancy. On this occasion I was on shift and Sunshine was over strength. This is an example of standby.

- c. **288 kilometres** claimed for 12 February – I travelled to meet with FRV Deputy Commissioner Cowling and the Psychological Services Team to tour a designated mental health facility for military and emergency service personnel. This was part of the Operational Employees OHS Subcommittee.
 - d. **178 kilometres** claimed for 5 March 2026 – I travelled to meet with Health and Safety Commanders and a HSR to discuss contaminated PPC Bin trial and roll out. This was part of the Operational Employees OHS Subcommittee.
 - e. **16 kilometres** claimed for 17 March 2026 – I travelled to Western District 1 HQ, 45 Millers Rd, Brooklyn for the Western District 1&2 Health and Safety meeting. This was part of the Western 1 and 2 Health and Safety Committee.
 - f. **198 kilometres** claimed for 26 March 2026 – I travelled for a final inspection and sign off for mould remediation works with WD1 Assistant Chief Fire Officer. This was part of the Resource and Deployment Approval Panel.
36. My March vehicle allowance claims include a claim for travel in January 2026 and in February 2026 which I had forgot to claim in those months.
37. Leaving out the January and February allowances, for March travel I claimed an allowance for 416 km of travel. This is a low month. A higher month is around 1,000 km. On average, I estimate I travel and claim an allowance for between 500 km and 1,000 km per month.
38. I have noticed a substantial increase in fuel costs in undertaking these duties placing a financial burden on my finances.



Peter Shroder
25 April 2026



Our locations

FRV operates 85 stations across the state and supports volunteer responses where required.

Download the FRV district map for Victoria.



FRV District Map - Victoria

PDF | 7.35 MB

/sites/default/files/2025-12/FRV_State_A4_V4.pdf

FRV fire station locations

Metropolitan Melbourne fire stations (47)

- Altona
- Ascot Vale
- Box Hill
- Broadmeadows
- Brooklyn
- Brunswick
- Bundoora
- Burwood
- Carlton
- Clayton
- Croydon
- Deer Park
- Derrimut
- Eastern Hill
- Epping

- Footscray
- Glen Iris
- Glen Waverley
- Greensborough
- Hawthorn
- Heidelberg
- Highett
- Keilor
- Laverton
- Mentone
- Newport
- North Balwyn
- Northcote
- Nunawading
- Oakleigh
- Ormond
- Pascoe Vale
- Port Melbourne
- Preston
- Richmond
- Ringwood
- Somerton
- South Melbourne
- St Albans
- Sunshine
- Taylors Lakes
- Templestowe
- Thomastown
- Tullamarine
- Vermont South
- West Melbourne
- Windsor

Greater Melbourne and Regional Victoria fire stations (38)

- Ballarat City
- Belmont
- Bendigo
- Boronia
- Caroline Springs
- Corio
- Craigieburn
- Cranbourne
- Dandenong
- Eltham
- Frankston
- Geelong City
- Greenvale
- Hallam
- Lara
- Latrobe West
- Lucas
- Melton
- Mildura
- Mornington
- Morwell
- Ocean Grove
- Pakenham
- Patterson River
- Point Cook
- Portland
- Rosebud
- Rowville
- Shepparton
- South Morang
- South Warrandyte

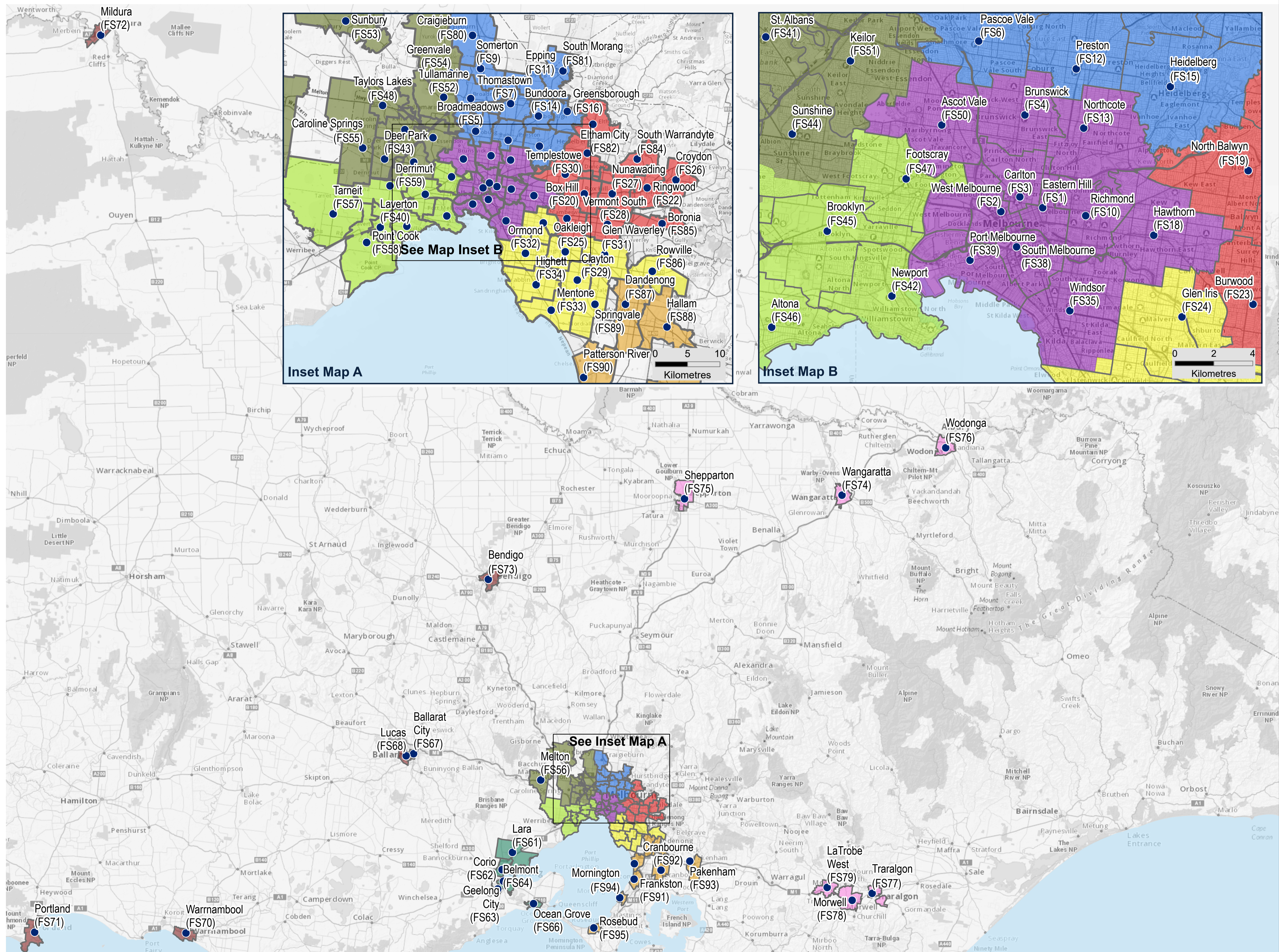
- Springvale
 - Sunbury
 - Tarneit
 - Traralgon
 - Wangaratta
 - Warrnambool
 - Wodonga
-

Updated 12 March 2026

Fire Rescue Victoria Stations and Districts

Legend

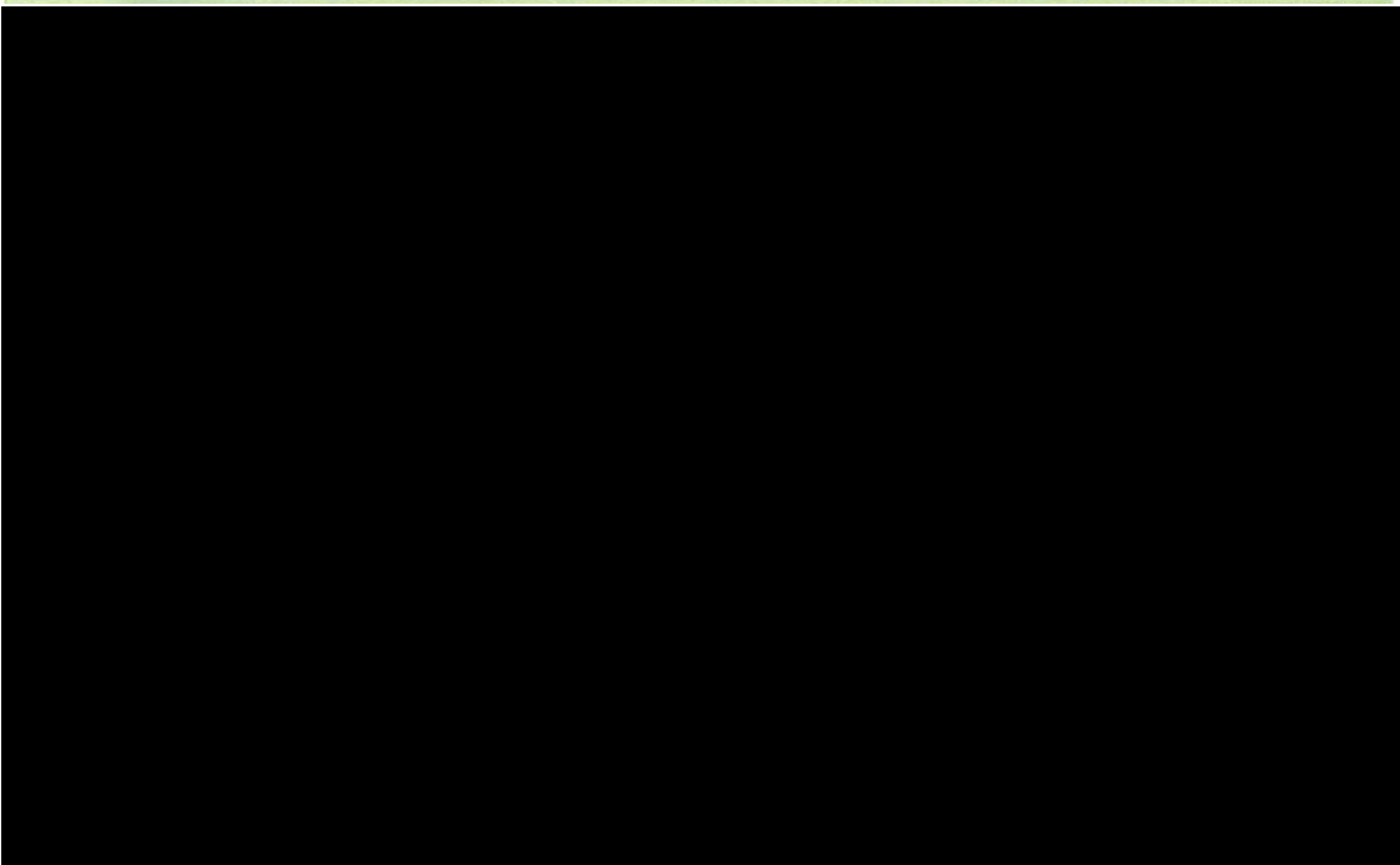
- FRV Stations
- CENTRAL
- EASTERN
- NORTH & WEST REGIONAL
- NORTHERN
- SOUTH & EAST REGIONAL
- SOUTHERN D1
- SOUTHERN D2
- WESTERN D1
- WESTERN D2
- WESTERN D3



RE RESCUE VICTORIA - DETAILS OF TRAVELLING EXPENSES / MEALS ALLOWANCES PAID

"PS-3" 257106

Cost Centre.....1344..... Station No.44.....

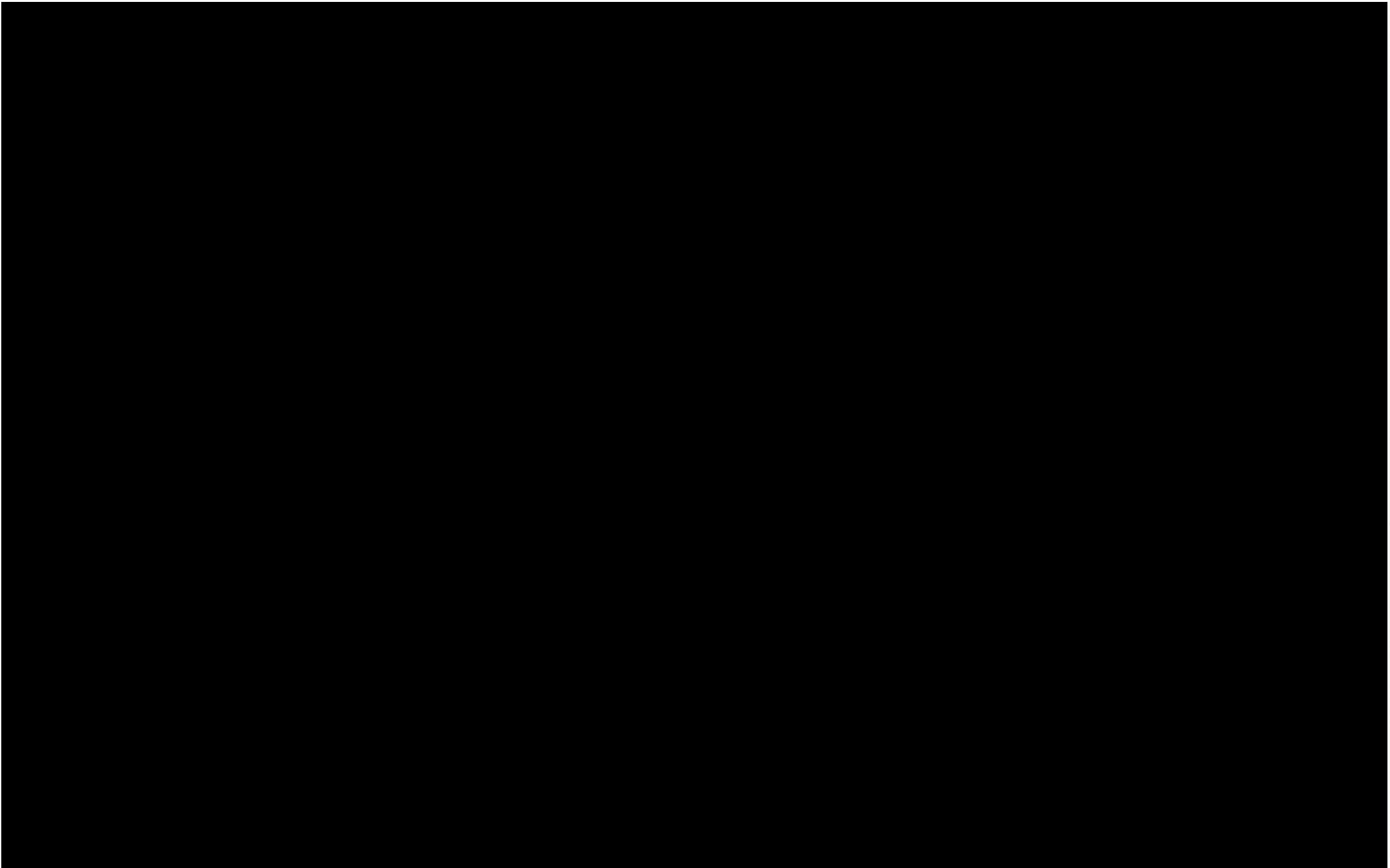


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RESCUE VICTORIA - DETAILS OF TRAVELLING EXPENSES / MEALS ALLOWANCES PAID

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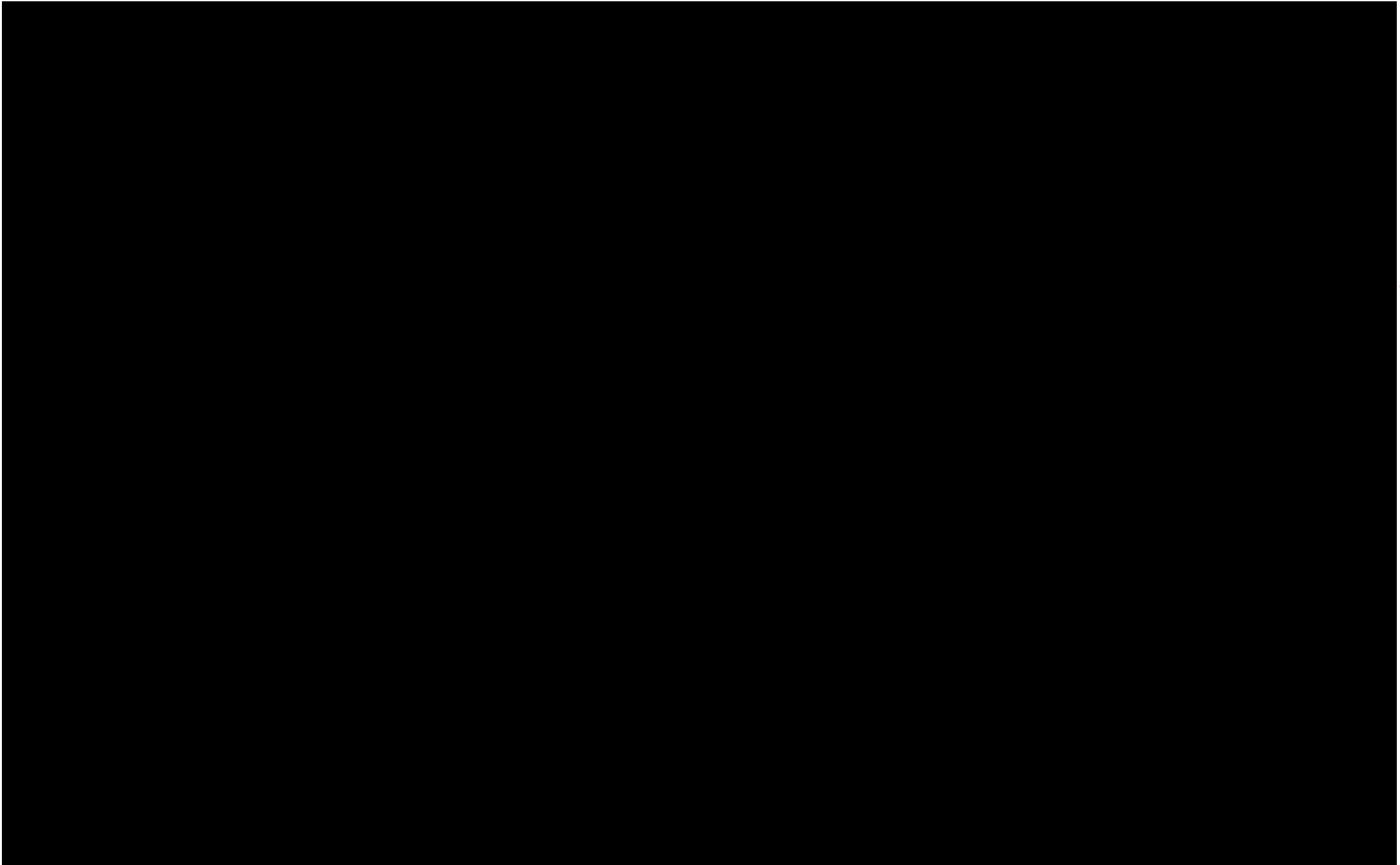


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RESCUE VICTORIA - DETAILS OF TRAVELLING EXPENSES / MEALS ALLOWANCES PAID

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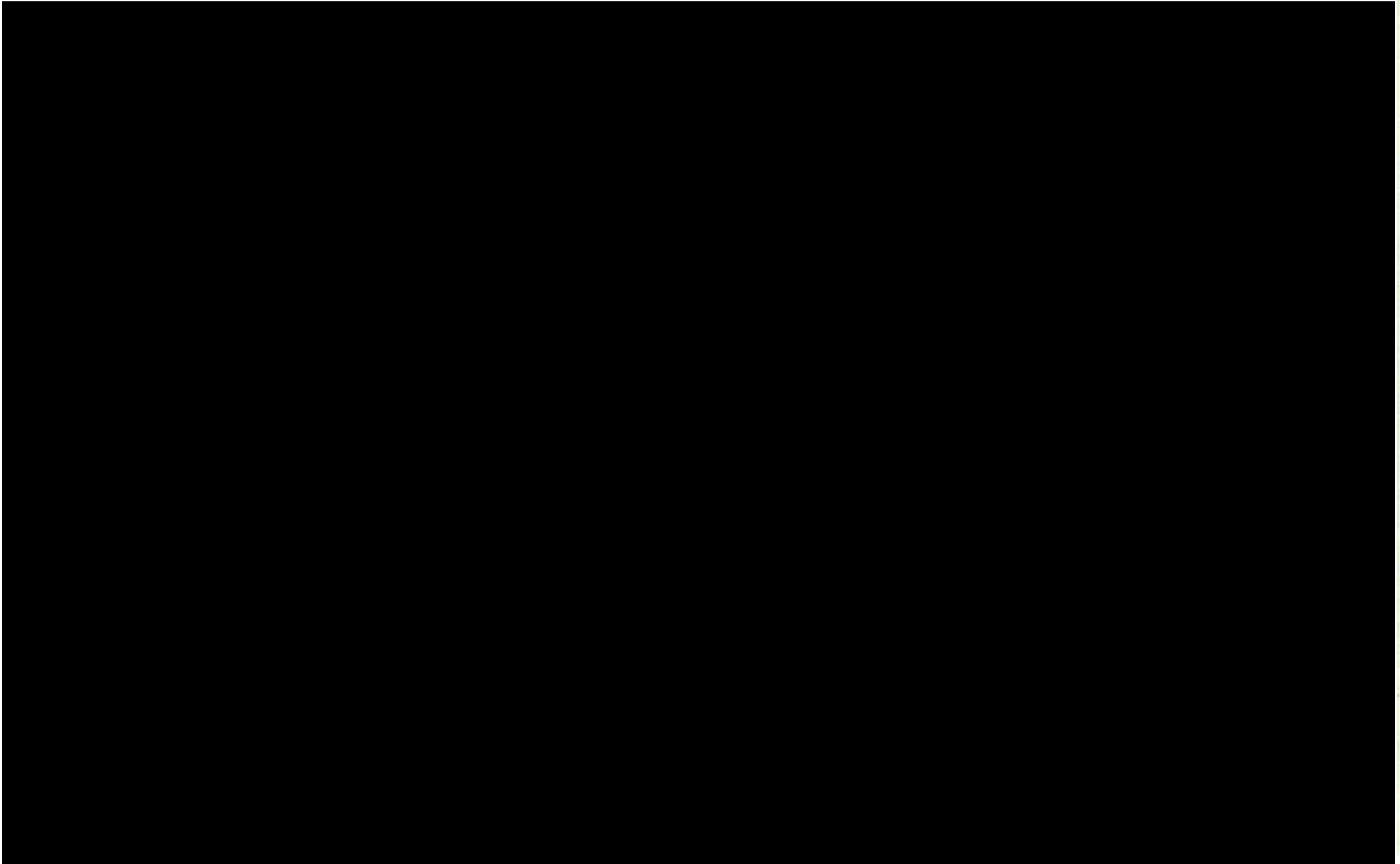


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RESCUE VICTORIA - DETAILS OF TRAVELLING EXPENSES / MEALS ALLOWANCES PAID

257128

Cost Centre.....1344..... Station No.44.....



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