

Appendix A:

Submissions and comments

We have consulted with Fire Rescue Victoria, Country Fire Authority, the Department of Energy, Environment and Climate Action, the Department of Justice and Community Safety, the Department of Treasury and Finance, Quik Corp, Mercedes-Benz Australia/Pacific and Daimler Truck Australia Pacific.

We considered their views when reaching our audit conclusions. As required by the *Audit Act 1994*, we gave a draft copy of this report, or relevant extracts, to those agencies and asked for their submissions and comments.

Responsibility for the accuracy, fairness and balance of those comments rests solely with the relevant agency head.

Responses received

Agency	Page
Fire Rescue Victoria	A-2
Country Fire Authority	A-9
Department of Energy, Environment and Climate Action	A-13
Department of Justice and Community Safety	A-17



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Ref/26OOC-66

Friday, 18 September 2026

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31, 35 Collins Street
MELBOURNE VIC 3000

Email: enquiries@audit.vic.gov.au

Dear Mr Greaves

Proposed report - Managing Victoria's Firefighting Fleet

Thank you for your letter dated 10 September 2026 and the opportunity to comment on the proposed report for the *Managing Victoria's Firefighting Fleet* performance audit.

I welcome the findings and recommendations in the proposed report and confirm Fire Rescue Victoria's (FRV) commitment to boosting our fleet capacity and improving fleet management and maintenance activities.

The report recognises the complexity of FRV's operating environment and the significant operational and organisational challenges that have influenced the maturity of fleet maintenance governance. FRV acknowledges that improvements are required and is committed to strengthening governance, oversight and seeking further investment to support a safe, reliable and effective fleet for Victorians.

The findings and recommendations of this report will support FRV to strengthen our framework, policies, processes, capability and data to enable the fleet across FRV's stations to be appropriately maintained and replaced to address current and future needs.

FRV accepts the five recommendations directed to fire authorities, and I am pleased to provide our proposed actions, many of which are already underway.

Should your officers wish to discuss FRV's response, please contact Simone Millen, Acting Executive Director, Strategic Services via [REDACTED] or [REDACTED]

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Gavin Freeman".

Gavin Freeman AFSM
Commissioner
Fire Rescue Victoria



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Fire Rescue Victoria action plan to address recommendations from *Managing Victoria's Firefighting Fleet*

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	- Establish firefighting fleet asset management arrangements that comply with all <i>Asset Management Accountability Framework</i> mandatory requirements and align with relevant better practice guidance, including: - the International Organization for Standardization 55000 series - relevant Australasian Fire Authorities Council standards - the Global Forum on Maintenance and Asset Management. - Develop and regularly update whole-of-life fleet plans, or equivalent, to quantify renewal and replacement needs, on a sustainable, long-term basis. - Make sure asset planning frameworks are approved by an appropriate level of authority and include regular review and update schedules (see Section 3).	☒ Yes ☐ No ☐ In part ☐ In principle	- FRV will develop a comprehensive governance framework for fleet including: - Updating the Appliance Replacement Policy - Develop an Asset Management Framework ready for consultation. The framework will be endorsed by the ELT and include review and update schedules. - FRV's Fleet Transformation actions will address compliance with relevant legislation including Heavy Vehicle National Law, and asset management best practice, from a range of sources including Australasian Fire Authorities Council standards. - FRV will develop an Infrastructure Replacement Strategy that will set out a long-term remediation plan using fleet data to optimise useful life, replacement timing, investment priorities and long-term funding requirements. - FRV will develop an evidence-based whole of life cost model and subsequent long term investment model at an asset category level through its Infrastructure Replacement Strategy. - FRV has developed a fleet typology analysis that captures the composition, profile and operational characteristics of its fleet. Insights from the Infrastructure Replacement Strategy will inform a future update of the Appliance Replacement Policy, incorporating condition, utilisation, service life and operational risk factors to support evidence-based	June 2028

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No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
3	Complete all scheduled maintenance according to maintenance schedules and original equipment manufacturing requirements (see Section 4).	☒ Yes ☐ No ☐ In part ☐ In principle	replacement decisions and long-term fleet sustainability. 6. FRV will coordinate a program of targeted initiatives supported by dedicated project governance. Collectively, these initiatives will provide the surge capability, reporting, asset analysis, maintenance remediation planning and implementation, both short term and long term: • Immediate measures include an additional satellite workshop capability located at Sunshine, additional OEM support, and third-party inspection maintenance for high-risk appliances. • Throughout 2026, 12 new Series 1 Pumpers will be put into commission. The outgoing appliances will remain maintained and allocated to reserve fleet to assist with surge capacity. • Recruitment is underway for a dedicated resource to lead fleet engineering reliability initiatives and additional resources to undertake fleet planning analysis across all scheduled servicing activities. • FRV has established weekly meetings with operational leaders, statewide, to monitor movements and maintenance. This approach establishes a weekly joint prioritisation mechanism between Fleet and Operations to assess and risk-rank appliances, ensuring fleet movements are planned and implemented in	December 2027

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No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
			line with operational risk. Focus is placed on mitigating risks associated with high-priority appliances Two key projects, Fleet Business Metrics Development and Fleet Management Pilot (Tactical EAM), will provide automated tracking and support maintenance reporting. 7. In January 2026, FRV opened a second fleet maintenance workshop in Sunshine to complement our Thornbury facility and increase maintenance capacity across the fleet. Since opening, Sunshine has become an integral part of our Fleet Services operating model, delivering scheduled servicing, reactive repairs and specialist maintenance activities that support appliance availability and operational readiness. 8. FRV will consider business cases for additional workshop facilities, based on operational need, and take advantage of any lessons learned from the opening of the Sunshine facility.	
4	- Improve the accuracy of firefighting fleet maintenance demand and cost forecasts by adopting a multi-year forecasting approach that considers fleet age, condition, performance, and the availability of parts and labour. - Annually review the accuracy of forecasts and update the modelling	Yes ☒ No ☐ In part ☐ In principle ☐	11. FRV will develop and implement a preventative maintenance compliance framework to strengthen maintenance governance, improve compliance monitoring, and support evidence-based decision-making. The framework will establish clear accountabilities for preventative maintenance activities, implement monitoring and reporting mechanisms, define escalation processes for non-compliance, and introduce regular compliance	June 2028

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No.	VAGO recommendation approach and underlying assumptions where necessary (see Section 5).	Acceptance	Agreed management actions	Target completion date
			reviews to support continuous improvement. Short term strategies include: • Strengthening oversight by clarifying existing business processes, responsibilities and accountabilities. • Addressing resource gaps through targeted recruitment activities. • Alignment of Preventative Maintenance Servicing requirements for all FRV Fleet transitioning from time-based servicing to duty-based servicing. Medium term strategies include: • Rollout of three funded projects (Infrastructure Replacement Strategy, Fleet Business Metrics Development, Fleet Management Pilot) via engagement of dedicated project managers. Outcomes will include IT solutions to capture data, produce notifications to highlight overdue preventative maintenance and produce monthly performance reporting to the Executive Leadership Team. Long term strategies include (subject to Government funding): • Rollout of the six (6) fleet optimisation initiatives to refine, improve and create efficiencies to match service delivery criteria.	

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No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
5	- Strengthen condition and performance monitoring of firefighting fleets, including: - fleet availability by asset class - service coverage - response times - the completion of scheduled maintenance - the volume and nature of unplanned repairs	☒ Yes ☐ No ☐ In part ☐ In principle	12. FRV has established a comprehensive program of work to support the redesign and continuous improvement of its fleet maintenance strategies and planning framework. This includes the Infrastructure Replacement Strategy, two additional funded programs commencing in 2026-27, and six further optimisation initiatives, which are subject to requests for further government funding. Together, these initiatives will provide the data, analytics, governance and asset lifecycle insights required for FRV's Fleet Planning team to develop, refine and optimise maintenance schedules based on operational demand, asset performance, condition and risk. This program will be supported by: - Resourcing tasked on overseeing fleet reliability and future fleet requirements - Resourcing tasked to adjust maintenance schedules based on available evidence - Resourcing tasked to identify asset class inspection and maintenance priorities. 13. FRV's Fleet Business Metrics Development and Tactical EAM will be rolled out to convert operational data into KPIs, dashboards and insights. This will be used to capture and integrate FRV fleet data. While the integration of CFA data will not be possible initially, the reporting will include CFA metrics where available. 14. The Tactical EAM will outline the required reporting cadence to ELT and its sub-committees. Regular reporting of preventative and corrective maintenance will be provided to ELT.	June 2028

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	- other measures that fire authorities see as relevant. - Use fleet condition and performance monitoring to establish proactive inspection and maintenance schedules for critical fire trucks to minimise downtime (see Section 4).		15. FRV's Asset Management Office will conduct quarterly reviews on preventative compliance requirements and report results to the Asset Management Steering Committee. 16. The Fleet Management Pilot (Tactical EAM) will establish the requirements for automated reporting processes. Any further development of a fit-for-purpose asset management and reporting system would require additional Government investment. 17. FRV has developed a typology analysis that captures the composition, profile and required operational capability statements for each vehicle class. 18. The arrangement with the OEM and FRV will include telematics going forward and is being implemented on all new appliances to monitor cab chassis and aerial boom diagnostics.	
6	As part of each annual state Budget process, advise the government about: - the risks that the condition of Victoria's firefighting fleet poses to service delivery and to community, staff and volunteer safety - the investment required in fleet renewal and maintenance to mitigate those risks (see Section 5).	☒ Yes ☐ No ☐ In part ☐ In principle	19. FRV will provide Government with an annual fleet status report, including risks to service delivery and community safety, projected asset condition trends, renewal requirements and funding implications over the forward years. FRV will continue to work with Government to secure funding as required to meet this action.	December 2027

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Patron: Her Excellency Professor the Honourable Margaret Gardner AC, Governor of Victoria

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Patron: Her Excellency Professor the Honourable Margaret Gardner AC, Governor of Victoria

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██████████
██████████
Victorian Auditor-General's Office

23 September 2026

Ref: PC26-112

C/O ██████████
██████████

Dear ██████████

RE: Performance Audit Report - Managing Victoria's Firefighting Fleet

Thank you for your letter dated 10 September 2026 providing CFA with an opportunity to respond to the proposed performance audit report *Managing Victoria's Firefighting Fleet* and for the opportunities provided to CFA to review and provide feedback at key points throughout the audit process. CFA acknowledges the constructive engagement of your staff throughout.

CFA's acceptance positions, agreed management actions and target completion dates are set out in the attached action plan. Implementation will be monitored through CFA's governance arrangements, including oversight by the CFA Risk and Audit Committee.

CFA remains committed to a safe, reliable and fit for purpose firefighting fleet that supports service delivery to communities across the Country Area of Victoria.

Should you require any further information, please contact CFA Chief Risk Officer, Rebecca Holding, via ██████████

I trust the above is of use and thank you again for the opportunity to provide feedback on the proposed performance audit report.

Sincerely,

Greg Leach AFSM
Chief Executive Officer

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Country Fire Authority action plan to address recommendations from *Managing Victoria's Firefighting Fleet*

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	- Establish firefighting fleet asset management arrangements that comply with all <i>Asset Management Accountability Framework</i> mandatory requirements and align with relevant better practice guidance, including: - the International Organization for Standardization 55000 series - relevant Australasian Fire Authorities Council standards - the Global Forum on Maintenance and Asset Management. - Develop and regularly update whole-of-life fleet plans, or equivalent, to quantify renewal and replacement needs, on a sustainable, long-term basis. - Make sure asset planning frameworks are approved by an appropriate level of authority and include regular review and update schedules (see Section 3).	☒ Yes ☐ No ☐ In part ☐ In principle	CFA will establish asset management arrangements that comply with all <i>Asset Management Accountability Framework</i> mandatory requirements. Compliance is self assessed and attested annually as part of the Department of Treasury and Finance Standing Directions process, with identified deficiencies subject to remediation. CFA will draw on relevant better practice guidance to improve its processes where practicable. CFA will regularly update whole of life fleet plans that quantify renewal and replacement needs, with planning frameworks approved at the appropriate level of authority and subject to scheduled review.	30 Sep 2027
3	Complete all scheduled maintenance according to maintenance schedules and original equipment manufacturing requirements (see Section 4).	☐ Yes ☐ No ☐ In part ☒ In principle	Accepted in principle because completion of all scheduled maintenance is influenced by factors outside CFA's full control, including operational demand, fleet availability and maintenance funding. CFA will update its maintenance documentation with targets and schedules and will monitor and report completion against those targets. CFA will seek to complete all scheduled maintenance in	Updated targets and schedules 30 Sep 2027 Assessment 30 Sep 2028

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			line with schedules, prioritised within available resources, and will seek funding through each annual State Budget process. CFA will assess alternative delivery approaches, including contractor partnerships and supplementary resourcing, and investment needs to keep maintenance facilities fit for purpose, subject to funding.	
4	- Improve the accuracy of firefighting fleet maintenance demand and cost forecasts by adopting a multi-year forecasting approach that considers fleet age, condition, performance, and the availability of parts and labour. - Annually review the accuracy of forecasts and update the modelling approach and underlying assumptions where necessary (see Section 5).	☐ Yes ☐ No ☐ In part ☒ In principle	CFA refreshes its Whole of Life Plan on a three yearly cycle, aligned with census data as one of the inputs to inform its resource to risk model that builds the evidence for fleet growth. CFA will review forecast accuracy annually as part of the planning and budget cycle and update modelling assumptions where necessary. Enhanced maintenance demand and cost forecasting is subject to future funding to expand enterprise asset management functionality within CFA's finance system. CFA will reflect this requirement in future funding requests to Government.	30 Sep 2027 Ongoing
5	- Strengthen condition and performance monitoring of firefighting fleets, including: - fleet availability by asset class - service coverage - response times - the completion of scheduled maintenance - the volume and nature of unplanned repairs - other measures that fire authorities see as relevant.	☐ Yes ☐ No ☐ In part ☒ In principle	Accepted in principle. CFA supports strengthened condition and performance monitoring across all measures identified. Full implementation is dependent on systems investment in data capture and analysis that is subject to future funding. CFA will strengthen monitoring of fleet condition and performance data, including utilisation and fault history, to identify emerging issues and inform proactive inspection and maintenance	30 Sep 2028, Ongoing

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				Subject to funding
	Use fleet condition and performance monitoring to establish proactive inspection and maintenance schedules for critical fire trucks to minimise downtime (see Section 4).		schedules for critical fleet. This will support earlier intervention, improve asset reliability and availability, and minimise unplanned downtime. Further enhancements to data capture and analysis will be informed by future systems investment, reflected in funding requests to Government.	
6	As part of each annual state Budget process, advise the government about: - the risks that the condition of Victoria's firefighting fleet poses to service delivery and to community, staff and volunteer safety - the investment required in fleet renewal and maintenance to mitigate those risks (see Section 5).	☒ Yes ☐ No ☐ In part ☐ In principle	CFA has outlined its fire truck replacement and upgrade needs to 2033-34 and this is addressed in recent business cases. CFA will continue to provide documented advice to Government through each annual state Budget process on the investment required in fleet renewal and maintenance to meet its service obligations to communities across the Country Area of Victoria and the risks that the condition of its firefighting fleet poses to service delivery and to community, staff and volunteer safety.	Complete

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Department of Energy, Environment and Climate Action

PO Box 500, East Melbourne,
Victoria 8002 Australia

SEC-260900517

Andrew Greaves
Auditor-General
Victorian Auditor-General's Office
Level 31, 35 Collins Street
Melbourne VIC 3000

Dear Auditor-General

Thank you for the opportunity to comment on the proposed report for the performance engagement *Managing Victoria's Firefighting Fleet*. The Department of Energy, Environment and Climate Action (DEECA) supports the report's focus on improving fleet governance, assurance and long-term planning and accepts the recommendations.

DEECA recognises the critical importance of maintaining a safe, reliable and operational firefighting fleet to support the protection of Victorian communities, firefighters, property and the environment. Through Forest Fire Management Victoria, DEECA plays a central role in Victoria's bushfire prevention, preparedness, response and recovery arrangements and is committed to ensuring its firefighters are supported by vehicles and equipment that are safe, reliable and fit for operational purpose.

DEECA acknowledges the historical deficiencies identified by the audit and accepts that these issues should have been identified and addressed sooner and is strengthening its current and future practices.

DEECA has already undertaken significant remediation and assurance activities. It is also progressing a broader reform program to strengthen fleet governance, engineering assurance, maintenance practices, performance monitoring, asset management and long-term fleet planning.

The safety of our firefighters and staff is paramount and has, and always will, guide DEECA's decision making. As acknowledged in the report, DEECA has always had established processes for annual preparedness checks and for responding to reported issues. These processes ensured that any specific vehicle defects were identified, fixed and certified before vehicles were returned to service.

When the broader structural fleet-wide issues became known and updated roadworthiness advice was received in October 2025, DEECA acted immediately and decisively. Affected vehicles were removed from service, a comprehensive remediation and assurance program was implemented, and accredited engineering certification was required before vehicles could return to service. DEECA also introduced ongoing inspection, monitoring and assurance arrangements to monitor vehicles once they returned to service.

DEECA will continue to take a precautionary approach whenever safety may be impacted and will act on new information as it becomes available.

Firefighter and employee safety remains at the centre of DEECA's fleet decisions, investment priorities and long-term planning. DEECA welcomes the audit's focus on continuous improvement. Through its reform program, the department will continue to strengthen operational capability, fleet management, assurance and long-term decision making while ensuring firefighters are supported by safe, reliable and fit-for-purpose vehicles and equipment to protect Victorian communities and the environment.



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I appreciate the opportunity to provide feedback on the proposed report and thank your staff for their work throughout the audit. I welcome continued engagement with your office as DEECA implements the report's recommendations and progresses its reform program.

Yours sincerely



Kate Houghton PSM
Secretary

23/09/2026

Encl.

Department of Energy, Environment and Climate Action

Action plan to address recommendations from VAGO's report: Managing Victoria's Firefighting Fleet

No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
1	Establish firefighting fleet asset management arrangements that comply with all <i>Asset Management Accountability Framework</i> mandatory requirements and align with relevant better practice guidance, including: - the International Organization for Standardization 55000 series - relevant Australasian Fire Authorities Council standards - the Global Forum on Maintenance and Asset Management. - Develop and regularly update whole-of-life fleet plans, or equivalent, to quantify renewal and replacement needs, on a sustainable, long-term basis. - Make sure asset planning frameworks are approved by an appropriate level of authority and include regular review and update schedules	☒ Yes ☐ No ☐ In part ☐ In principle	DEECA will develop, approve and implement a whole of life firefighting fleet asset management strategy that complies with the AMAF mandatory requirements, aligns with relevant better practice standards and establishes clear arrangements for governance and periodic review.	30 October 2027
2	Establish and implement a quality management system for designing, developing and modifying the firefighting fleet that complies with the International Organization for Standardization 9001, to minimise the risk of non-compliance with road safety, heavy vehicle and occupational health and safety laws	☒ Yes ☐ No ☐ In part ☐ In principle	DEECA will update and implement its quality management system for the design, development and modification of firefighting fleet assets that supports compliance with relevant safety and regulatory requirements.	30 October 2027
3	Complete all scheduled maintenance according to maintenance schedules and original equipment manufacturing requirements	☒ Yes ☐ No ☐ In part ☐ In principle	DEECA will strengthen its scheduled maintenance program to ensure the completion of all scheduled maintenance in accordance with original equipment manufacturer requirements.	30 October 2027
4	- Improve the accuracy of firefighting fleet maintenance demand and cost forecasts by adopting a multi-year forecasting approach that considers fleet age, condition, performance, and the availability of parts and labour. - Annually review the accuracy of forecasts and update the modelling approach and underlying assumptions where necessary.	☒ Yes ☐ No ☐ In part ☐ In principle	DEECA will establish and annually review a multi-year maintenance demand and cost forecasting model for the firefighting fleet that considers fleet age, condition performance and the availability of parts and labour to inform maintenance planning and investment decisions.	30 October 2027

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No.	VAGO recommendation	Acceptance	Agreed management actions	Target completion date
5	- Strengthen condition and performance monitoring of firefighting fleets, including: - fleet availability by asset class - service coverage - response times - the completion of scheduled maintenance - the volume and nature of unplanned repairs - other measures that fire authorities see as relevant - Use fleet condition and performance monitoring to establish proactive inspection and maintenance schedules for critical fire trucks to minimise downtime	☒ Yes ☐ No ☐ In part ☐ In principle	DEECA will strengthen condition and performance monitoring approach for the firefighting fleet including measures for fleet availability, service coverage, response times, scheduled maintenance completion and unplanned repairs and use this information to inform inspection, maintenance and fleet planning decisions.	30 October 2027
6	As part of each annual state Budget process, advise the government about: - the risks that the condition of Victoria's firefighting fleet poses to service delivery and to community, staff and volunteer safety - the investment required in fleet renewal and maintenance to mitigate those risks	☒ Yes ☐ No ☐ In part ☐ In principle	DEECA will strengthen its annual approach to advising government through the State Budget process on the condition of Victoria's firefighting fleet, associated service delivery and safety risks, and long-term investment requirements for fleet renewal and maintenance.	31 May 2027

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Managing Victoria's Firefighting Fleet

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Department of Justice and Community Safety

Secretary

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Our ref: 26092377

Mr Andrew Greaves
Auditor-General
Victorian Auditor-General's Office

By email: [REDACTED]

Dear Mr Greaves

Proposed report: Managing Victoria's firefighting fleet

Thank you for your letter of 10 September 2026 providing the proposed report on Managing Victoria's firefighting fleet for final response.

The Department of Justice and Community Safety (the department) has reviewed the report and remains committed to working with our emergency services organisation to support efficient and effective management and delivery of Victoria's emergency services.

The attached action plan, due for completion in April 2027, addresses the one recommendation directed to the department.

If you have any questions or require further information, please contact Fiona Dowsley, Executive Director, Data, Performance and Governance, on [REDACTED] or via email to [REDACTED]

Yours sincerely

Emma Cassar PSM
Secretary

21 / 09 /2026

Encl. DJCS Action Plan – Managing Victoria's firefighting fleet



DJCS action plan

Managing Victoria's firefighting fleet

#	VAGO recommends that DJCS/relevant agencies:	Response	#	By:	By:
6	As part of each annual state Budget process, advise the government about: - the risks that Victoria's firefighting fleet poses to service delivery and to community, staff and volunteer safety. - the investment required in fleet renewal and maintenance to mitigate those risks.	Accept	6	Implement a process to ensure the department supports relevant portfolio agencies to provide advice to government through the annual state budget process on: - any risks that the condition of Victoria's firefighting fleet poses to service delivery, and to community, staff and volunteer safety. - the investment required in fleet renewal and maintenance to mitigate those risks.	30/04/2027