



URGENT & OPEN CORRESPONDENCE

24 November 2025

Eddie Lacko
Deputy Commissioner
Fire Rescue Victoria
By email only

Dear DC Lacko,

Breaches of Enterprise Agreement obligations and Health & Safety Obligations including but not limited to: Consultation, Safe Systems of Work, employer responsibility to employees

I refer to your communique “**Operational Communications – Radios**” sent to FRV Firefighters/UFU Members at 5:26PM, Friday 21 November 2025 (**enclosed**).

We understand you sent this communique after media inquiries were made of Fire Rescue Victoria regarding multiple failed radio tests concerning the **Government’s Big Build Projects**, including the Melbourne Metro Tunnel and West Gate Tunnel.

In the context of **Radio communications**, in your Friday communique, you admit that Fire Rescue Victoria is now aware of the critical radio communications issue.

Further, you state:

“In the event that either the MMR Network or FRV portable radios fault, local simplex channels will be utilised to enable the continuation of firefighter communications.”

However, you would be aware that, in the context of major underground infrastructure like the Metro Tunnel, **a reliance on local simplex channels is unreliable and unsafe**:

Firstly, there is no monitored duress function. This issue, in itself, is a significant safety issue. Your policy of informing the Office of the National Rail Safety Regulator (**ONRSR**) that there are no issues means that you have personally, and organisationally, endorsed a system where there is no ability for your employees/FRV Firefighters to activate the duress signal. This will result in the loss of a FRV Firefighter’s life.

Secondly, simplex communication is a line-of-sight communication redundancy and, therefore, communications can only travel over a limited distance and is dependent on the location of the firefighter i.e. handheld radio to handheld radio only. For example, if Firefighter A is around a corner (i.e. behind a concrete wall), they will be totally unable to communicate with Firefighter B. This also means that Officers/Incident Controllers will be unaware at all times of the safety of their crews.

Thirdly, oncoming back-up firefighting crews/appliances will not be able to communicate over the network, meaning urgent messages will be missed by firefighting crews/appliances.

Fourthly, where there are *multiple* emergency incidents in the Melbourne CBD or relevant area (which is a high likelihood in the context of a tunnel incident), messages on the “simplex network” can be received by the wrong crew and wrong truck as they are close by. We have been



advised by FRV Firefighters/UFU Members that this has happened previously, leading to firefighting crews carrying out the wrong instruction at the wrong emergency incident.

Fifthly, firefighters utilising the “simplex network” are not assured that their message has been transmitted and, further, are not aware of when another radio is trying to transmit messages to them.

Sixthly, the redundancy you advocate for (i.e. line of sight communications – “simplex network”) does not transmit back to the communications centre i.e. this means that the communications centre has no ability to understand what is occurring on the fireground/at the emergency incident.

The above is a small sample of what could lead to significant and potentially catastrophic firefighter injury, the causation of which is your ill-conceived and irresponsible communique. This brings us to the following:

Letter of No Objection in the context of safety issues known by Fire Rescue Victoria

It has further come to the attention of the United Firefighters Union that Fire Rescue Victoria has provided a **Letter of No Objection** to the ONRSR.

However, as Fire Rescue Victoria officials including you, personally, are well aware, there were – and continue to be – significant safety issues compromising both firefighters and the Victorian public. In addition to the radio communications issue (which is further detailed below), these issues include but are not limited to:

- a. **Current Long Duration Breathing Apparatus (LDBA):** All units are outdated and non-operational, leaving Fire Rescue Victoria (the relevant response agency for the Metro Tunnel) without access to functional current LDBAs.
- b. **The Victorian Government’s statement that this deficiency in emergency response and rescue capabilities will be filled by engaging CFA OSCAR1 Mine Rescue Brigade.** However, as you would be aware, emergency incidents are time-critical. OSCAR1 Mine Rescue Brigade is in regional Victoria (two hours away from Melbourne), is not staffed 24/7 (no guaranteed response), the number of trained operators is unknown, and there is no compatibility with FRV’s systems. You are aware that OSCAR1 is a volunteer fire brigade and, as such, the availability of volunteer personnel is inconsistent (through no fault of their own as a result of being presented with leaving their primary place of residence or work to respond to the fire station, if they are, in fact, available).
- c. **Future Long Duration Breathing Apparatus:** Insufficient funding and lack of preparedness by FRV’s Executive Management to procure new LDBAs, despite being aware for at least 18 months that the current units would be out of service by the end September 2025. This has resulted in not having any capability in performing a rescue in any of the ‘Big Build’ infrastructure in Melbourne, such as the Metro Tunnel or West Gate Tunnel.
- d. **Railway Network Emergency Response Vehicles (RNERVs):** No external maintenance of equipment, unclear documentation regarding their locations across Melbourne, variations in RNERV equipment types and associated skill



gaps, incomplete training records and syllabi, and a lack of firefighter training on these pieces of equipment.

The later additions of the RNERVs are different from the previous deployment of RNERVs and, in some cases, require assembling and using a crane-like 'davit arm' by FRV Firefighters.

- e. **Radio Communications:** Testing (including as recently as last week) confirms there is presently no radio communications coverage in major Melbourne infrastructure, such as the Metro Tunnel.

Despite FRV sending a Letter of No Objection, FRV was aware that there was critical safety issues that had not been addressed or rectified. It was only after FRV sent its Letter of No Objection, that FRV discovered significant radio channel communications issues. This has only occurred in the last week and a half:

On Thursday 13 November, 4 of 5 radios tested by Fire Rescue Victoria in the West Gate Tunnel failed. It is understood by Fire Rescue Victoria that these failures extend to the Metro Tunnel infrastructure.

On Friday 14 November, further testing of radios was conducted by Fire Rescue Victoria in the West Gate Tunnel. The 10-12 radios tested also failed. Again, it is understood by Fire Rescue Victoria that these failures extend to the Metro Tunnel infrastructure. After investigations as to why the failure has occurred, Fire Rescue Victoria in conjunction with Telstra (only as recently as last week) have determined the following:

- The fault is *not* in the network in the underground/tunnel environment – rather, it is the FRV radios themselves that contain the fault.
- The issue with the FRV radios is an issue with the *configuration* of the radios. That is, the programming of the FRV radios is incorrect.
- This issue extends to the entire fleet of FRV radios – being approximately 6,000 portable FRV radios. Portable radios are absolutely critical to fireground operations. No ability to communicate goes not just to the very heart of the safe systems of work for firefighters in not being able to operate per their Standard Operating Procedures but, indeed, creates a significant and potentially catastrophic risk to the community if the opening of the Metro Tunnel (or the West Gate Tunnel) were to proceed whilst this critical problem exists.

- f. **Fire Indication Panel:** Testing as recently as Monday 17 November confirms that Metro Tunnel staff continue to experience issues with assisting FRV Firefighters to location, Fire Indication Panel alarm descriptions are confusing,



FRV Firefighters are not trained in computer systems sitting within the fire control room.

- g. **Atmospheric Monitoring:** Insufficient monitoring during emergency incidents.

The above safety issues, coupled with the fact that FRV has issued a **Letter of No Objection**, could amount to an abrogation of your responsibility as an employer to act impartially given you have a responsibility to your employees and are party to a legally enforceable industrial instrument (Enterprise Agreement).

Instead, it appears that FRV has instead demonstrated partisan acquiescence to a State Government in the Government's early opening of major infrastructure at the expense of your obligations to your employees and your obligations under the Enterprise Agreement. That is unforgiveable.

The UFU reserves all rights.

Yours Sincerely,

Peter Marshall
UFU Branch Secretary