

Applicant: United Firefighters' Union of Australia

Respondent: Fire Rescue Victoria

UFU's Position Document

1. This position document is filed by the UFU pursuant to Order 4 of the Directions dated 25 October 2023.

Agreed Terms for the purposes of s.274(3)

2. All the terms identified as agreed in Version 14 of the draft Enterprise Agreement dated 26 July 2023 are agreed terms for the purposes of s.274.¹

Matters at issue pursuant to section 270(3)

3. The only matters that were still at issue at the conclusion of the post-declaration negotiating period were the quantum of wages and allowances, and the funding for the minimum staffing provisions (the terms of which were otherwise agreed).²

¹ The Third Statement of Laura Campanaro at [69], LC-11 (referred to as the "revised Version 14").

² The Third Statement of Laura Campanaro at [143], [151].