



Victorian Inspectorate

Report to the Parliament of Victoria on

Controlled Operations

1 July 2017 to 30 June 2018

Tabled March 2019

INSPECTION OUTCOMES RELATING TO CONTROLLED OPERATION RECORDS HELD BY AUTHORISED VICTORIAN GOVERNMENT AGENCIES DURING 2017-2018.

INTRODUCTION

In Victoria five State Government agencies are authorised to conduct controlled operations.

Two agencies are authorised to conduct controlled operations under the *Crimes (Controlled Operations) Act 2004* (Vic) ('the CCO Act'):

- Independent Broad-based Anti-corruption Commission (IBAC); and
- Victoria Police.

The Victorian Fisheries Authority (VFA) is authorised to conduct controlled operations under Part 7A of the *Fisheries Act 1995* (Vic) ('the Fisheries Act').

The *Wildlife Act 1975* (Vic) ('the Wildlife Act') permits the following two agencies to conduct controlled operations:

- Department of Environment, Land, Water and Planning (DELWP); and
- Game Management Authority (GMA).

The legislation governing these activities requires that the Victorian Inspectorate (VI) inspect the records of these agencies to determine the level of statutory compliance achieved by them and their law enforcement officers. The VI prepares an annual report on the work and activities of the agencies during the year. A copy of the report is provided to the Chief Officer of each agency and the relevant Minister, and is tabled in the Parliament of Victoria.

SUMMARY OF INSPECTION OUTCOMES

The legislation governing the five agencies permits reports on each to be combined into a single report. The VI has elected to combine these for the 2017-2018 reporting year.

In summary the outcomes of those inspections are as follows:

VFA

The VFA conducted two controlled operations during the 2017-2018 period. All statutory requirements in regards to the records maintained were met.

The statutory requirements of the Chief Executive Officer report, however, were not met with the second report being received outside the due date. The details of the report were fully compliant.

In the 2016-17 VI Report it was noted that the records pertaining to one operation inspected in that year contained unsigned cancellation documentation. On re-inspection in the first half of the reporting period for 2017-18, the file was re-inspected and all documentation was on file with the appropriate authorities, signatures and dates.

DELWP

The VI was informed by the officers of DELWP that no controlled operation authorities had been applied for, granted or completed during the 2017-2018 year, and as a result no inspections took place.

Both Chief Officer reports were received within the statutory timeframes and contained the requisite information.

GMA

The GMA has advised that no controlled operation authorities had been applied for, granted or completed during the 2017-2018 year, and as a result no inspections took place.

Both Chief Officer reports were received within the statutory time frames and contained the requisite information.

IBAC

The VI conducted two rounds of inspections that related to the records of IBAC during the 2017-18 financial year. The records relating to the one controlled operation conducted were presented and found to be fully compliant.

The two Chief Officer reports made by the Commissioner were received by the due date and were fully compliant.

VICTORIA POLICE

There are two work units within Victoria Police – the Controlled Operations Registry within the Crime Department and the Technical Projects Unit, within Professional Standards Command – who conduct controlled operations. During the 2017-2018 reporting period Professional Standards

Command did not conduct any controlled operations and therefore no inspection of records was undertaken in relation to controlled operations at the Technical Projects Unit.

The Controlled Operations Registry has a very diligent internal quality control process and as a result VI officers found only one compliance issue during the inspections undertaken.

Both Chief Officer Reports were received within the statutory timelines and were assessed as satisfactory. The reports contained some minor inaccuracies that were reviewed and promptly addressed.

ACKNOWLEDGEMENT

The VI acknowledges the total cooperation of the Chief Officers and staff of the agencies with all aspects of the VI role in the inspection of their records.



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Inspector

THE ROLE OF THE VICTORIAN INSPECTORATE

The VI provides independent oversight of the use made by the authorised agencies of controlled operations. The VI is required to inspect the records of the agencies to determine the level of statutory compliance achieved by each agency and its law enforcement officers. To ensure an accurate assessment, the VI has established processes which involve reviewing applications, authorities, reports and other documents. This enables the VI to assess whether the authority for a controlled operation was properly issued and whether activities conducted under that authority complied with the governing legislation.

The VI is required to prepare an annual report of the work and activities of each agency during the year. A copy of the report is provided to the Chief Officer of each agency and the relevant Minister, and is tabled in the Parliament of Victoria.

INSPECTION FUNCTIONS

The VI must inspect the records of each agency from time to time but at least once every 12 months for the purpose of assessing the level of statutory compliance achieved. The established practice of the VI is to schedule two inspections for each agency every 12 months, unless an agency has conducted sufficiently few controlled operations that one inspection in the year is adequate.

REPORTING FUNCTIONS

The annual report prepared by the VI includes the following information:

- the results of inspections undertaken at each agency
- an assessment of the level of compliance with the legislation applicable to the agency
- an overview of the work and activities of agency officers carried out under the provisions of the relevant Act
- an assessment of the comprehensiveness and adequacy of each report on a controlled operation that is required to be made by the principal law enforcement officer to the Chief Officer of an agency.

The VI's report must not include information that enables the identification of a participant in an operation. The Chief Officer must also advise the VI of any information that should be excluded from the VI's report if in his or her opinion the information may:

- endanger a person's safety; or

- prejudice an investigation or prosecution; or
- compromise any law enforcement agency's operational activities or methodologies.

The VI's annual report must be tabled as soon as practicable after the VI receives the Chief Officer's second report in the year period, which is due as soon as practicable after the 30 June each year, but no later than 31 August.

INSPECTION METHODOLOGY

At each inspection the VI examines relevant documents, records, reports and registers to assess and determine the level of statutory compliance achieved by the agency under the applicable Act.

Each inspection includes an examination of the following:

- all documents and records relating to completed authorised operations and which are required to be kept by the agency; and
- the general register.

The content of each record is inspected to determine:

- whether it includes the information required;
- whether the information that had accompanied or formed part of each application was sufficient to enable the approving officer to properly determine whether to grant or refuse the application; and
- whether the operation for which authority was sought was consistent with a controlled operation as defined in the legislation.

In addition to assessing the reports to determine compliance with relevant statutory requirements, the VI must also state whether it received the reports of the Chief Officer within the requisite timeframe.

The Chief Officers of each agency must report to the VI as soon as practicable, but no more than two months, after 31 December and 30 June of each year, setting out specific details about the activities of the agency under the relevant governing legislation.

During 2017-2018, two Chief Officer Reports were required to be made under this legislation:

- the first report of operations during 2017-2018, due no later than 28 February 2018

FEATURES OF THE LEGISLATION

Victoria Police and IBAC are authorised to undertake controlled operations under the *Crimes (Controlled Operations) Act 2004* (CCO Act). VFA may undertake controlled operations under the *Fisheries Act 1995* (Fisheries Act), while DELWP and GMA are authorised to undertake controlled operations under the *Wildlife Act 1975* (Wildlife Act).

The provisions of these Acts are generally similar, although the Fisheries Act and the Wildlife Act contain specific provisions limiting the types of offences that may be investigated and the operational scope of a controlled operation.

A controlled operation is an operation that:

- (a) is conducted, or is intended to be conducted, for the purpose of obtaining evidence that may lead to the prosecution of a person for a relevant offence; and
- (b) involves, or may involve, controlled conduct.¹

Controlled operations authorise participants to engage in ‘controlled conduct’ being an act for which he or she would be criminal liable. However the legislation contains an immunity provision which grants a participant immunity from criminal liability for ‘controlled conduct’ engaged in by him or her during the course of the operation.²

The legislation allows a law enforcement officer of an authorised agency to apply for an authority to conduct the controlled operation and outlines the processes for the application and the authority to allow the conduct to be engaged in.³ In particular the application should:

- state how the application has been made (formal or urgent)⁴
- be in writing⁵
- contain sufficient information to enable the authorising officer to decide whether or not to grant the application⁶
- advise whether there is a link to a previous operation application.⁷

In addition, the application (and any authority issued) must establish a nexus between the purpose of the controlled operation (to obtain evidence⁸) and the controlled conduct to be engaged in.

¹ Section 6, *Crimes (Controlled Operations) Act 2004* (CCO Act), section 131A *Fisheries Act 1995* (fisheries Act), section 71 of the *Wildlife Act 1975* (Wildlife Act).

² Sections 28 and 35 CCO Act, section 131A Fisheries Act, section 74H Wildlife Act

³ Division 2 of Part 2 of the CCO Act; Division 2 of Part 7A of the Fisheries Act; Division 2 of Part IX of the Wildlife Act.

⁴ Section 12(2) of the CCO Act; section 131C(2)(a) of the Fisheries Act; section 73(2)(a) of the Wildlife Act. **Note:** Only Victoria Police and IBAC may make an urgent application.

⁵ Section 12(3)-(4) of the CCO Act; section 131C(2)(b)-(c) of the Fisheries Act; section 73(2)(b)-(c) of the Wildlife Act.

⁶ Section 12(4) CCO Act; section 131C(2)(b)-(c) of the Fisheries Act; section 73(2)(b)-(c) of the Wildlife Act.

⁷ Sections 14-17 of the CCO Act; section 131E of the Fisheries Act; section 74A of the Wildlife Act.

⁸ Section 6 of the CCO Act; section 131A of the Fisheries Act; section 71 of the Wildlife Act.

The authority is granted by the appropriately delegated officer⁹ of the authorised agency and must contain all the legislated requirements including the signature of an authorising officer¹⁰

All agencies must keep the following documents:¹¹

- each application for a controlled operation
- each authority granted for a controlled operation
- all written notes made in connection with the authorisation of a controlled operation on an urgent application¹²
- each application for a variation of an authority to conduct a controlled operation
- each variation of authority granted
- all written notes made in connection with the granting of a variation to an authority¹³
- each order cancelling an authority
- each PLEO report.

The Chief Officer is also responsible for keeping a general register which records certain information referable to applications for and granting of authorities and variations, and certain details about the outcome of each controlled operation.¹⁴

Chief Officers of each agency must report to the VI as soon as practicable, but no more than two months, after 31 December and 30 June of each year¹⁵, setting out specific details about the activities of the agency under the relevant governing legislation.

During 2017-2018, two Chief Executive Officer reports were required to be made under this legislation:

- the first report of operations during 2017-2018, due no later than 28 February 2018
- the second report of operations during 2017-2018, due no later than 31 August 2018.

⁹ Sections 44 -45 of the CCO Act, section 131X of the Fisheries Act, section 74T of the Wildlife Act

¹⁰Section 18 of the CCO Act, section 131F of the Fisheries Act, section 74B

¹¹ Section 40 of the CCO Act; section 131U of the Fisheries Act; section 74Q of the Wildlife Act.

¹² Urgent applications may only be made by law enforcement officers of Victoria Police and IBAC.

¹³ Applicable only to Victoria Police and IBAC.

¹⁴ Section 41 of the CCO Act; section 131V of the Fisheries Act; sections 74R and 74RA of the Wildlife Act.

¹⁵ Section 39(2) of the CCO Act, section 131S(2) Fisheries Act and sections 74O(2) and 74OA(2) of the Wildlife Act

INSPECTION RESULTS –VFA

In accordance with the VI's obligations under the Fisheries Act, the VI inspected VFA records to determine the level of compliance with the Act.

In the 2016-17 VI Report it was noted that the records pertaining to one operation contained unsigned cancellation documentation. At the time the officers of VFA advised that the cancellation documents had been sent off for signatures and that these had been obtained. However, as these were not available at the time of inspection, the omission was reported by the VI. On re-inspection in the first half of the reporting period for 2017-18, the file was re-inspected and all documentation was on file with the appropriate authorities, signatures and dates.

WORK AND ACTIVITIES OF FISHERIES VICTORIA

The use by the VFA of the controlled operations provisions under the Fisheries Act is occasional with one controlled operation having been undertaken during the 2017-2018 period. As is the usual custom, the VI conducted two rounds of inspections that related to the records of the VFA during the 2017-2018 year.

In summary the outcomes of those inspections were that there were no compliance issues identified; reports prepared by principal law enforcement officers were assessed to contain all the requisite information.

Duration of an authority

The effect of s 131F(1)(g) of the Fisheries Act is that the authority must state the period of validity for each operation type. The one authority that was inspected complied with this requirement.

Application for a variation

Section 131H of the Fisheries Act provides for an application to be made to vary an authority. VFA officers made no applications for variations during the reporting period.

CHIEF OFFICER'S REPORTS

Timeliness of Chief Officer's reports

The VFA were compliant in sending the first report by the date required under s 131S of the Fisheries Act, however the second report was received 31 days late.

Comprehensiveness and adequacy of Chief Officer's reports

The contents of the 2017-2018 reports to the VI were assessed for comprehensiveness and adequacy. In this regard, both reports were found by the VI to be compliant with the requirements of s 131S.

SUMMARY

The officers of the VFA have demonstrated their understanding of the requirements of the controlled operation provisions of the governing legislation and with the exception of the late report from the Chief Officer in the second half of the period, were compliant with the Act.

INSPECTION RESULTS - DELWP

In accordance with the VI's obligations under the Wildlife Act, the VI scheduled two inspections during the 2017-2018 year for the purpose of inspecting relevant DELWP records to determine the level of compliance with the Wildlife Act. The Intelligence and Investigations Unit (IIU) is the division within DELWP that uses powers under the Wildlife Act to conduct controlled operations.

WORK AND ACTIVITIES OF DELWP

Prior to attending the IIU for the purpose of conducting inspections under the Wildlife Act, the VI was informed that no controlled operations authorities had been applied for, granted or completed during the 2017-2018 year.

In these circumstances, the VI's attention was drawn to the statutory obligation of the Secretary of DELWP to report to the VI as soon as practicable after each 31 December and 30 June, but not more than two months after that date, regarding the work and activities of IIU. The Secretary must report to the VI even if the provisions under the Wildlife Act have not been used during the reporting period.

SECRETARY'S REPORTS

Timeliness of Secretary's reports

Both reports were received by the date required pursuant to s 74O of the Wildlife Act.

Comprehensiveness and adequacy of the Secretary's reports

DELWP reported to the VI that no operations had been undertaken during the period under report and otherwise supplied information that complied fully with the requirements of s 74O.

SUMMARY

During the reporting period, DELWP did not make use of the controlled operations provisions under the Wildlife Act. The VI's report is therefore limited to consideration of DELWP's reporting obligations with which DELWP was fully compliant.

INSPECTION RESULTS – GMA

As the GMA has not conducted any controlled operations, the VI's consideration of the agency's compliance with the Wildlife Act is limited to an assessment of the biannual reports provided to the VI in accordance with section 74OA of the Wildlife Act.

GMA REPORTS

Timeliness of GMA's reports

With both reports having been received by the due date, GMA was found to have complied with the time frames as set out in section 74OA.

Comprehensiveness and adequacy of GMA reports

The GMA reported to the VI that no operations had been undertaken during the period under report and otherwise supplied information that complied fully with the requirements of section 74OA.

SUMMARY

The GMA did not conduct any controlled operations. The VI's report is therefore limited to consideration of the GMA's reporting obligations with which GMA was fully compliant.

INSPECTION RESULTS - IBAC

In accordance with its obligations under the CCO Act, during the 2017-2018 reporting period the VI scheduled two inspections of IBAC's records for the purpose of assessing the level of statutory compliance achieved by the agency and its law enforcement officers.

The VI was scheduled to conduct the first inspection of IBAC records in October 2017. However, before that time, the VI was informed by IBAC that no authorised controlled operations had been commenced and concluded during the inspection period.

In May 2018 the VI attended IBAC offices and inspected the records and documents relating to one controlled operation which IBAC had commenced and concluded during the entirety of the 2017-2018 reporting period. They were assessed to be fully compliant. The report prepared by the principal law enforcement officer for the operation was also assessed as fully compliant.

WORK AND ACTIVITIES OF IBAC

The level of detail reported

Whilst the VI's report must cover the work and activities of the agency, it must also take account of sections 39(2)-(4) of the CCO Act. These subsections require the VI to exclude from its reports information that might endanger the safety of a person, prejudice an investigation or prosecution, or compromise IBAC's operational activities or methodologies. Acknowledging this means that the intent of the VI's report is to provide an overview of the work and activities undertaken by IBAC.

Duration of an authority

The effect of sections 18(3)(j) and 19 of the CCO Act is that the authority must state the period of validity for each operation type. The one file inspected was fully compliant with this requirement.

Application for a variation

Section 21 of the CCO Act provides that an application for variation of an authority may be made; IBAC officers made no applications for variations to controlled operations in the reporting period.

CHIEF OFFICER REPORTS

Timeliness of Chief Officer's reports

The VI found that IBAC was fully compliant with the requirements of section 38 of the CCO Act with both reports having been received within the required timeframes.

Comprehensiveness and adequacy of Chief Officer's reports

The VI is satisfied with both the comprehensiveness and adequacy of the reports provided by the Chief Officer for the reporting period.

SUMMARY

IBAC authorised and concluded one controlled operation during the reporting period. Having inspected the relevant documentation and considered the statutory reports provided to it, the VI is satisfied that IBAC and its law enforcement officers have fully complied with the requirements of the CCO Act.

INSPECTION RESULTS – VICTORIA POLICE

For the purposes of inspecting controlled operations records, the VI attended Victoria Police twice during the 2017-2018 year, in December 2017 and in June 2018. The number of records inspected did not directly correlate with the number of applications made or operations completed for the year because when conducting the inspection, the VI officers only considered those operations which had been completed and for which PLEO reports had been submitted.

There are two units of the Victoria Police who maintain the records for controlled operations conducted by Victoria Police, they are – the Controlled Operations Registry (COR) within the Crime Department and the Technical Projects Unit (TPU), within Professional Standards Command.

INSPECTION OF AGENCY RECORDS AND DOCUMENTS

Professional Standards Command did not conduct any controlled operations during the inspection period and therefore no inspections of records were undertaken at the TPU.

During the 2017-2018 reporting period, VI officers inspected a total of 107 controlled operations files maintained by the COR, being 57 in December 2017 and 50 in June 2018.

Applications for authorities to conduct controlled

All but 1 of the 107 controlled operation applications inspected were formal applications. All applications were identified as compliant. This demonstrates a thorough understanding by Victoria Police of the legislative requirements.

Form of Authority

Section 18 of the CCO Act sets out the information that must be included in an authority (whether formal or urgent). One file was found to contain an administrative error during the second round inspection. The error related to the omission of the name and position of the officer granting the authority to conduct the controlled operation activity. The authority had been appropriately signed and dated however section 18(3)(a) of the CCO Act also requires the name and rank of the officer signing the authority. The VI confirmed that this officer had the necessary delegation to authorise the operation.

Duration of an authority

The effect of sections 18(3)(j) and 19 of the CCO Act is that the authority must state the period of validity for each operation type. All files inspected were fully compliant with this requirement.

Application for a variation

Section 21 of the Act provides that an application for variation of an authority may be made for one or more of the following reasons:

- to extend (except for certain controlled operations referred to in section 20(2) of the Act), the period of validity of the authority¹⁶
- to authorise additional or alternative persons to engage in controlled conduct
- to authorise participants to engage in additional or alternative conduct
- to identify additional suspects (to the extent known).

Of the 107 files inspected, 56 had one or more variations. The majority of variations were to extend the period for which the authority was in force.

All variations were assessed as fully compliant.

Principal Law Enforcement Officer's Reports

A PLEO report is required for every controlled operation; s 37 of the CCO Act not only sets out the timeframe within which the PLEO report is due, but also specifies the information which must be included in the report. All reports during this period were assessed as fully compliant.

CHIEF OFFICER REPORTS

Timeliness of Chief Officer's reports

Victoria Police satisfied the requirement of s 28 of the CCO Act as both reports were received by the required date.

Comprehensiveness and adequacy of Chief Officer's reports

The VI must comment on the comprehensiveness and adequacy of the chief officer reports provided to it under section 38 of the CCO Act.

¹⁶ Section 20(2) proscribes extending the period of validity when an authority is urgent or local minor. In such circumstances a fresh application for a new controlled operation authority is required.

The two reports submitted to the VI for 2017-2018 were assessed as satisfactory. The reported information contained some minor administrative errors, three were identified in the first report and three in the second. Once identified these were promptly addressed by Victoria Police. It is pleasing to note that when issues of concern were raised, these were reviewed and quickly addressed.

WORK AND ACTIVITIES OF VICTORIA POLICE

The level of detail reported

Whilst the VI's report must cover the work and activities of the agency, it must also take account of sections 39(2)-(4) of the CCO Act. These subsections require the VI to exclude from its reports information that might endanger the safety of a person, prejudice an investigation or prosecution, or compromise Victoria Police's operational activities or methodologies. Acknowledging this means that the intent of the VI's report is to provide an overview of the work and activities undertaken by Victoria Police.

Victoria Police utilises the controlled operations provisions more than any other Victorian agency.

Victoria Police granted a total of 136 formal authorities and 1 urgent authority during 2017-2018¹⁷ representing a slightly decreased total on the previous reporting period (Table 1).

Table 1: Comparison of number of authorities issued over 4 year period

Year	2014-2015	2015-2016	2016-2017	2017-18
Number of authorities issued	119	131	141	137

The VI notes that by the time a Victoria Police application to engage in controlled conduct is submitted for final approval, it has already been the subject of a series of sound drafting and vetting processes and procedures. The VI draws confidence from this now well established practice. This is further demonstrated by considering the small number of administrative errors noted by the VI during 2017-2018 and in previous years against the significantly large number of files inspected.

Authorised controlled operations to be conducted wholly within Victoria are categorised as either local minor or local major. Local minor operations target offending which is punishable by less than

¹⁷ These are the figures reported by Victoria Police in section 38 Chief Officer Reports as the number of authorities listed in each financial year. They are not the same as the number of completed authorities inspected by the Inspectorate in those periods.

three years' imprisonment, while local major operations target offending punishable by 3 years' imprisonment or more. In 2017-2018, 11 local minor and 124 local major operations were authorised by Victoria Police.

The VI notes that only by exception will Victoria Police authorise a local major operation for the permitted maximum period of 3 months. Rather, it will usually be seen to initially authorise for a shorter period and, then, if circumstances so require, vary the authority. The VI continues to support this approach, particularly when civilian participants are authorised to engage in controlled conduct.

Of the 136 authorised controlled operations which ceased (expired or cancelled) during the reporting period, 79 were varied on 131 occasions. Consistent with previous years, the majority of variations were to extend the period of validity. However variations to add additional suspects or participants and to authorise alternate or additional conduct were also made during the reporting period.

The CCO Act permits the authorisation of controlled conduct in jurisdictions other than Victoria, provided that other jurisdiction is a 'participating jurisdiction' as defined in the CCO Act. During 2017-2018, 1 cross border operation was granted.

The fact that Victoria Police grants and cancels authorities for a period less than the maximum permitted highlights the tight control it exercises over the use of controlled operations powers and highlights its commitment to ensuring that an operation does not continue longer than necessary. In 2017-2018, 8 authorities were formally cancelled under section 25 of the CCO Act, (compared with 18 in the previous year). Ninety one authorities expired during the period.

Authorised controlled operations may target multiple types of offending during the one operation and, therefore, the authorised conduct may extend to include multiple offence types. As has been the case previously, there are a number of operations in which no conduct was engaged in by the authorised participants. This can occur for different reasons, such as situations where evidence was obtained by other means or when it was considered unsafe to deploy authorised participants.

Victoria Police continues to adhere to a rigorous application process which is well complemented by close monitoring. Such a process not only enables serious offending to be targeted, but also ensures community interests are protected.

SUMMARY

Although there has been a slight decline in numbers Victoria Police has continued to undertake a high number of controlled operations during the 2017-2018 reporting year. While the majority of controlled operations files inspected by the VI were fully compliant, one file contained an administrative error and COR have now tightened their procedures to ensure that this error does not

re-occur. The cooperation received from Victoria Police, particularly its readiness to discuss and to respond to the issue/s raised by VI officers, is gratefully acknowledged.

Victoria Police's Chief Officer's reports in 2017-2018 were received on time and contained only a tiny number of administrative errors. Due to the high volume of operations conducted and the nature of the errors, both reports were assessed as satisfactory.

Victoria Police well understands its legislative compliance obligations and, notwithstanding that one compliance issue was identified during this reporting period, overall there was an excellent level of compliance, particularly given the high volume of applications.

As in previous years, Victoria Police not only continued to fully cooperate with and respond to the VI's various requirements and queries, but was very receptive to the constructive feedback offered and for which the VI is most grateful.

LIST OF ABBREVIATIONS

CCO Act	<i>Crimes (Controlled Operations) Act 2004</i>
COR	Controlled Operations Registry
Fisheries Act	<i>Fisheries Act 1995</i>
GMA	Game Management Authority
IBAC	Independent Broad-based Anti-corruption Commission
IIU	Intelligence and Investigations Unit
PLEO	Principal law enforcement officer (in respect of a controlled operation)
TPU	Technical Projects Unit (Professional Standards Command)
VFA	Victorian Fisheries Authority
VI	Victorian Inspectorate
Wildlife Act	<i>Wildlife Act 1975</i>