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6 March 2019

Inquiry into the provision of rescue, fire fighting and emergency response at Australian airports

Dear Senators,

I am writing to you in relation to the Inquiry into the provision of rescue, fire fighting and emergency response at Australian airports. The Australian Airports Association (AAA) appreciates the invitation to provide a submission to this Inquiry.

By way of background, the AAA is the national industry voice for airports in Australia. The AAA represents the interests of more than 320 airports and aerodromes Australia wide – from local country community landing strips to major international gateway airports. The AAA's members include Adelaide, Brisbane, Cairns, Canberra, Darwin, Gold Coast, Hobart, Perth, Melbourne and Sydney airports. There are a further 140 corporate members who provide goods and services to airports. The Charter of the AAA is to facilitate co-operation among all member airports and their many and varied partners in Australian aviation, whilst maintaining an air transport system that is safe, secure, environmentally responsible and efficient for the benefit of all Australians.

The AAA notes that the focus of the Committee's Inquiry, as per the terms of reference, is primarily on the standards and operational functions associated with aviation rescue and fire fighting (ARFF) services, as well as the functions of Airservices Australia (Airservices) and the Civil Aviation Safety Authority (CASA).

In regards to the standards for aerodrome rescue and fire fighting services, in Australia these are established and maintained by CASA and are reflective of Australia's commitment to the International Civil Aviation Organisation (ICAO) Standards and Recommended Practices (SARPs), especially those stated in ICAO Annex 14. The Civil Aviation Safety Regulations (CASR) Subpart 139.H and the associated Manual of Standards (MoS) prescribe the rescue and fire fighting requirements at Australian aerodromes.

Airservices is responsible for providing aviation rescue fire fighting (ARFF) services at 26 of Australia's busiest airports. Responding to approximately 6900 aircraft and airport emergency assistance requests nationally in 2017-18, Airservices' primary function is to rescue people and property from an aircraft crash or fire and from other fires on the airport. Airservices performs this critical function in line with the standards and regulatory requirements established by CASA, which reflect international best practice through alignment with ICAO requirements.

The AAA has a productive and collaborative working relationship with both CASA and Airservices and we have no concerns regarding the established standards for ARFF services or the performance of Airservice in relation to its ARFF service operations. Rescue and fire fighting operations are critical for many airports across Australia, and Airservices undertakes this function in a professional, effective and collaborative manner that ensures incidents are responded to as quickly as possible.

The AAA is also aware that the Department of Infrastructure, Regional Development and Cities (the Department) commenced a policy review in December 2015, which was focussed on the arrangements for the establishment and disestablishment of ARFF services. This review was initiated in response to recommendations from the Aviation Safety Regulatory Review. The consultation paper proposed increasing the annual passenger trigger threshold from 350,000 to 500,000 for establishing ARFF services at an airport, with disestablishment to be considered when annual passenger numbers dropped to 400,000 (rather than 300,000), both of which would be combined with a new risk-based assessment process.

The AAA's submission to that policy review largely supported the proposed changes on the basis that introducing a new risk-based assessment, in conjunction with revised passenger trigger levels, recognised the increase in traffic levels at airports and signalled a move towards more outcomes-based regulation in line with international best practice.

In December 2016, the then Minister for Infrastructure and Transport (the Hon Darren Chester MP) announced the outcomes of the policy review, stating the Government's intention to implement the proposed changes outlined in the Department's policy paper and increase the passenger thresholds and introduce risk assessments to inform decisions on ARFF services.

However, the AAA notes that in June 2018, the Deputy Prime Minister and Minister for Infrastructure and Transport (the Hon Michael McCormack MP) adjusted the regulatory policy reforms, such that the passenger number trigger for a risk assessment for the establishment of ARFF services remain at 350,000 (rather than 500,000) and for disestablishment, remain at 300,000 (rather than 400,000).

While the Government decided not to increase the passenger threshold, the introduction of the risk assessment process still improves the regulatory model by moving to a more outcomes-based approach. The addition of this risk review process (rather than considering passenger numbers in isolation) allows for a consultation process with stakeholders to consider other relevant factors that will further inform the decision to establish/disestablish an ARFF service.

Unfortunately, the AAA will not be in a position to attend the public hearing process for this Inquiry, however should you have any questions please do not hesitate to contact me

Yours sincerely,

Caroline Wilkie
Chief Executive Officer