



**United Firefighters Union of Australia  
Aviation Branch**

*Registered Office:*

86A O'Shanassy St, Sunbury, Victoria 3429

Postal Address: PO Box 966, Sunbury 3429

Ph: (03) 9746 3722 Fax: (03) 9746 3766

Email: [ufuavat1@bigpond.com.au](mailto:ufuavat1@bigpond.com.au)

ABN: 96 533 521 914

7<sup>th</sup> July 2008

Dept of Infrastructure, Transport Regional Development & Local Government  
GPO Box 594  
CANBERRA ACT 2601

Dear Sir /Madam

**United Firefighters Union of Australia - Aviation Branch White Paper  
submission towards a National Aviation Policy Statement**

**Opening statement**

The United Firefighters Union (UFU) welcomes the opportunity to put forward its views on behalf of our aviation firefighting members located throughout Australia. It is noted that within the discussion paper only a cursory reference is made about aviation rescue and fire fighting (ARFF) services under 'General Aviation' with an imputation that ARFF activities are in some way removed from commercial airline activity. It should be reiterated that the provision of ARFF services are directly associated to commercial airline activity as part of Australia's signatory obligations to the Chicago convention.

In relation to this paper the UFU have made detailed submissions to both the DOTARS discussion paper on ARFF (attached) and the more recent Senate enquiry into CASA's governance and administration (currently subject to Senate privilege) which address many of the key challenges raised in this issues paper.

We would encourage Government to consider all our submissions in totality when developing a National Aviation Statement.

The following comments relate to specific ARFF issues that have a direct relationship to the Australian aviation industry, infrastructure and safety, within the context of the key challenges raised in this paper.

## 1.1 International services

What are the implications of expanded international operations at secondary airports, including for border security? Should Australia seek to limit international airline and charter operations to a defined set of international airports to ensure affordable border security?

*The provision of ARFF to ICAO standards is mandatory for all international aircraft landing in Australia; this already limits the number of airports to which international charters may land. Rather than limit the flights coming into Australia government should establish ARFF services at secondary airports. Currently, there is no mandated fire service coverage at these airports and, as a consequence, we have seen too many aviation tragedies unfold at Bankstown, Moorabbin and Jandakot.*

## 1.3 Regional and general aviation

What should be the basis of government and industry policy towards air services to regional and remote communities?

*To encourage the development of air services to regional and remote areas government should introduce a national Passenger Facilitation Charge (PFC) and remove all landing charges to industry. This in effect removes any disincentives (location/site specific charging) to the aviation industry and ensures that additional funding and/or subsidies are available to encourage development of remote area routes and services throughout Australia.*

*Adoption of a PFC similar to the American model prevents industry lobby groups advocating cuts in essential services such as ATC and ARFF; it also allows government the necessary self funding to provide more ARFF and ATC services around the country.*

What role should all levels of government have in protecting secondary airport infrastructure and providing for new infrastructure?

*Adoption of a PFC will provide government with the necessary revenue stream to take a proactive role in protecting secondary airport infrastructure. Government must legislate to provide fire protection services at secondary airports. Previous ARFF services were provided when the passenger benchmarks exceeded 175,000 at secondary airports. The establishment figure for major airports was 150,000 passengers which has now been increased to 350,000 with the introduction of the CASR139H. That would now equate to a 400,000 passenger benchmark for provision of ARFF at secondary airports. It should also be noted that, currently, no dedicated Fire Service exists at any secondary civil airport.*

## 1.4 Addressing skills needs in the aviation industry

What strategies should the industry adopt to attract, retain and plan for their future skills needs to remain competitive in a tight labour market, and how can these be improved?

*Retention of trained staff is a must. Too much has been invested to see them join other brigades and skill-based remuneration is an important factor for staff retention, but improvement in conditions of employment is another method which can increase job satisfaction and does not impact on wages growth.*

What are the long-term training needs for the Australian aviation industry? Where will the future pressures lie? How do we ensure the industry remains internationally competitive in retaining key staff and in attracting new entrants to the workforce?

*The physical ability to train enough firefighters to meet demand remains a serious problem as does the ability to find sufficient fire officers with the necessary experience to replace increasing numbers of retirees. Of recent times, the ARFF has relied on lowering qualification standards and fast tracking staff to fill vacancies. This is resultant from no forward planning by Airservices Australia and the expectation that, under the previous Federal Government, ARFF services was to be privatised.*

How should the Australian Government and industry work together to ensure the needs of the aviation industry are taken into account in its broader skills framework?

*Consideration could be given to using existing State resources, i.e., Fire Service Training colleges and recognition of brigade Public Safety Training Standards to broaden and supplement the pool of available firefighters and increase officer training options. This would also be the first step towards firefighter interchanges which would impart greater practical experience for both Services.*

Are proposals such as a national industry-run flying school to train flying instructors worth investigating and, if so, how might such a school operate?

*It is worth evaluating the viability of a National Fire Service training college that can ensure training standards and competence towards a national firefighting standard and qualification structure and, hence, a greater resource pool for aviation rescue and firefighting units.*

## **2.1 Airport planning and development**

Can the growing use by civil aviation of joint user- or Defence-owned airports be safely and effectively accommodated?

*Not at present. One reason budget airlines target Defence-owned airports is that they are not subject to the normal landing charges that apply where Airservices Australia provides air traffic services including ARFF.*

*Where defence provides a Fire Service they are not bound by the current CASR139H regulations and there is no guarantee that the Fire Service is available or that if it is, it meets CASR139H requirements.*

As the aviation industry grows and changes with the advent of low-cost carriers and other innovative service providers, should changes be made to the regulatory framework for the pricing of airport services and monitoring of service quality?

*Yes, consideration should be given to the introduction of a passenger facilitation charge to reduce costs at smaller airports by removing location specific charging. Increased scrutiny by the ACCC and transparency of airport charges would assist in reassuring passengers they are getting a fair deal and value for money.*

## **2.2 Air traffic management**

How effective have Australian regulatory agencies been in pro-actively assessing the Australian air traffic management system and setting clear risk-based safety and efficiency outcomes requirements, having regard to international developments?

*In relation to ARFF, CASA has been ineffective in giving any regard to international developments related to ARFF. CASA has refused to acknowledge international developments in category provision and minimum personnel standards - even when none exist in Australia.*

*ICAO recommendations to remove the remission factor in January 2005 have not been implemented and NFPA standards for minimum ARFF personnel numbers have been ignored.*

*CASA has allowed risk-based safety and efficiency outcomes to be used as a tool to dismantle regulatory minimum standards without having an independent ARFF specialist available to examine and scrutinise the industry developed risk assessments.*

Are we effectively aligning airspace classifications and the level of services and facilities provided to reduce risk to passenger transport operations? Can we better identify risk factors?

*No. To date the risk is increasing with CASA failing to maintain regulatory standards.*

*Risk assessments are useless when applied to firefighting service provisions; task related assessments are what should be adopted in conjunction with benchmarking to international standards. However, in saying that, there still needs to be an independent assessment of any change to existing provisions. That assessment could be done by a panel of subject matter experts from Australia and overseas agencies.*

What steps need to be taken to ensure the retention, training and future supply of skilled Air Traffic Controllers and associated professionals?

*The same steps that would apply for firefighters; better remuneration, better conditions, greater reward for long service and an employer that understands how to provide a world-class Fire Service not run as a business focused on budgets and bottom lines.*

### **3.1 Safety regulation and regulatory reform**

Should the governance arrangements for CASA be strengthened to better support the role of the safety regulator?

*Too much licence has been given to CASA to change or give dispensation to regulations without having the necessary expertise to make those decisions. Tighter governance should prevent that happening.*

How can CASA strengthen the way it relates to industry while meeting the community expectations of a firm regulator?

*Keep CASA as the regulator focused on its primary role and utilise DOTARS/ATSB in an enforcement role to ensure compliance.*

How can the Australian Government and industry ensure CASA completes its long-running regulatory reform process as soon as possible, to give clarity to industry and to clear the way for new approaches to meeting the regulatory challenge?

*After 8 years we are still awaiting the 121A regulations to be finalised. The regulation is supplemental to the 139H in that it determines that "an aircraft may only land at an aerodrome that has appropriate ARFF services commensurate to the aircraft type."*

*In relation to ARFF regulations, CASA is preparing to remove key elements of the regulations based on approaches from industry (Airservices Australia) that minimum standards are too prescriptive and that they should be removed for easier compliance.*

*So, to answer the question of what can the government and industry do to get CASA back on track, might we suggest that regulatory reform should not be about changing the rules to satisfy lobby groups, it should be about making changes that ensure safety and reflect international standards.*

*If CASA lacks the expertise to complete the regulatory reform then they need to source people who can. If they lack someone to make a decision then get a new CEO. If lobby groups are the reason for the delays then ignore them as they no doubt have a vested interest in lobbying in the first place.*

What changes could be made to improve how Australia's aviation safety agencies work together?

*One could argue we have too many safety agencies and none of them with the same agenda. A starting point would be to have one dedicated safety authority with a non-vested interest in regulation or service provision.*

*CASA has demonstrated on matters related to ARFF services that they are open to lobbying and direction from industry to ignore or give exemption to current safety regulations. In the last 12 months the UFU has witnessed a lowering of qualification standards below agreed industry levels; we have seen a lowering of staffing levels below agreed industry standards; a failure to adhere to international conventions such as the remission factor; and failure to investigate regulatory breaches when brought to CASA's attention.*

*Government could consider amalgamating CASA with DOTARS and operate as a single safety department which would have a regulatory arm, an investigative arm and an enforcement arm. There also remains a need to develop advisory panels that are not industry lobby groups but experts from the aviation industry that genuinely advocate safety and the advancement of aviation in Australia.*

What issues should a 21<sup>st</sup> century aviation regulator be focussed on?

*That regulations remain relevant and enforced. The regulator should have greater involvement with relevant international bodies and panels and establish industry working groups to keep pace with global developments and should not be hamstrung by whole of government budgetary constraints.*

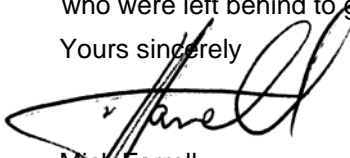
## **Summary**

There is much to be done in relation to the provision of ARFF at airports in Australia, particularly in providing the appropriate world-class fire and rescue capabilities that the travelling public expect already exist. The previous Government was focused on the privatisation of the ARFF and, as a result, have run the service down. That is to say, qualifications and standards have been dangerously diluted with the imprimatur of the Civil Aviation Safety Authority.

Further, infrastructure and forward planning is groaning under the weight for the requirements to expand. This is just a brief outline of a large problem that exists within the aviation industry in Australia; a problem that has the propensity to develop into a catastrophe.

We have so far been fortunate that a major accident or incident such as the Yogyakarta plane crash has not occurred in Australia but statistics tell us we will not continue to be so lucky. If a major incident like that should occur where ARFF services is currently provided, we are of the opinion that the current approach to provision of the ARFF in Australia would not allow for a world-class response and, subsequently, believe a successful outcome is in jeopardy. We have witnessed aircraft crashes at secondary airports such as Moorabbin, Bankstown and Jandakot resulting in deaths where there are no fire and rescue services in situ. It then must be considered: Were these crashes survivable if the appropriate fire and rescue response had been available? The answer may be, perhaps not. The point is, neither those people nor their family and friends who were left behind to grieve, ever had the chance to find out.

Yours sincerely



Mick Farrell  
Branch Secretary/  
National President